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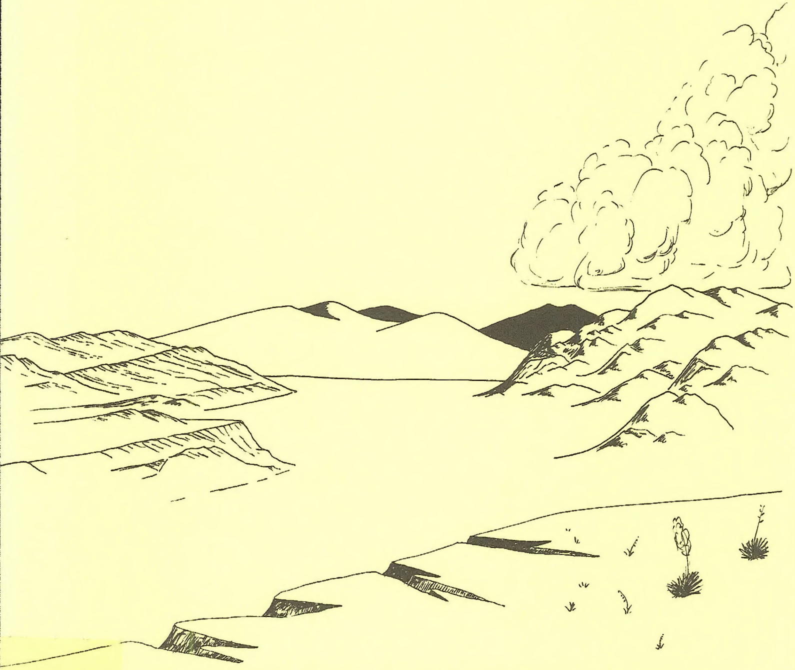

FINAL ENVIRONMENTAL IMPACT STATEMENT

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management · Battle Mountain District
Battle Mountain, Nevada 1987

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FINAL ENVIRONMENTAL IMPACT STATEMENT

WILDERNESS RECOMMENDATIONS

for the

SHOSHONE-EUREKA RESOURCE AREA

NEVADA

Prepared by

DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

BATTLE MOUNTAIN DISTRICT

Terry L. Plummer

Terry L. Plummer
Battle Mountain District Manager

E F Spang

Edward F. Spang
Nevada State Director

The proposed land use plan amendment contains wilderness recommendations on 152,160 acres of public land in Lander County and portions of Eureka and Nye Counties, Nevada. The action responds to the mandate of Section 603 of the Federal Land Policy and Management Act of 1976 to review all public land roadless areas of 5,000 acres or more and roadless islands having wilderness characteristics; determine their suitability or nonsuitability for wilderness designation; and report these suitability recommendations to the President no later than October 21, 1991.

For further information contact: Ms. Mary M. O'Brien, Shoshone-Eureka Resource Area Manager, at Bureau of Land Management, North 2nd and Scott Streets, Battle Mountain, Nevada 89820 or call (702) 635-5181.

Date final statement was made available to the Environmental Protection Agency and the Public:

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SUMMARY

SUMMARY

The purpose of the Proposed Action for one WSA and a portion of one WSA examined in this EIS is to secure for the American People, of present and future generations, the benefits of an enduring resource of wilderness, and further to release one WSA and part of another for future management under multiple-use and sustained yield principles. This EIS assesses the environmental consequences of managing all three WSAs as wilderness, nonwilderness, and partial wilderness for the Antelope WSA.

The three WSAs being studies are listed below:

WSA Name	Number	Acreage
Antelope	NV-060-231/241	87,400
Roberts	NV-060-541	15,090
Simpson Park	NV-060-428	49,670

ISSUES

The scoping process for the Shoshone-Eureka Wilderness EIS encompassed issues identified by the BLM staff, by the public during formal scoping comment periods, at public meetings held in Battle Mountain, Austin, Eureka, and Reno (in May 1981), and from comments on the draft EIS by the public and by Federal, State and local agencies. During the scoping period, there was consultation with the Nevada State Historic Preservation Officer concerning the presence or absence of cultural resources in the WSAs that would be eligible for nomination for listing on the National Register of Historic Places. The United States Fish and Wildlife Service was consulted concerning the potential effects of wilderness designation on threatened or endangered species. The environmental issues identified for analysis in this EIS as a result of the scoping process include the following for all WSAs:

1. Impacts on Wilderness Values
2. Impacts on Recreational Off-Road Vehicle Use
3. Impacts on Development of Mineral resources

Summary of Alternatives and Conclusions

The alternatives assessed in this EIS include: (1) a No Wilderness Alternative for each WSA, (2) an All Wilderness Alternative for each WSA, and (3) a Partial Wilderness Alternative for the Antelope WSA.

ANTELOPE WSA (NV-060-231/241)

Proposed Action (Partial Wilderness)

Under the Proposed Action, 83,100 acres of the Antelope WSA would be recommended suitable for wilderness designation and 4,800 acres would be recommended nonsuitable for wilderness designation.

On the 83,100 acres designated as wilderness, the area's naturalness and opportunities for primitive and unconfined recreation and solitude would be retained. Special features of James Wild Horse Trap, pristine spring meadows and Indian relics would be protected. On the 4,800 acres not designated wilderness, there would not be a significant impact to naturalness and opportunities for solitude.

The 83,100 acres would be closed to recreational ORV use in the designated wilderness, however five miles of cherrystem roads would remain open to recreational ORV use. This would not change the amount of use which occurs at present.

On the 4,800 acres of the WSA not designated wilderness, recreational ORV use would continue to increase slightly, but would not exceed 100 visitor days annually for the foreseeable future.

Alternative A (All Wilderness)

Under the All Wilderness Alternative, the entire 87,400 acres of the Antelope WSA would be recommended as suitable for wilderness designation.

On 87,400 acres of the WSA, there would be a slight improvement of the area's naturalness, solitude and opportunities for primitive and unconfined recreation. Special features of James Wild Horse Trap, pristine spring meadows and Indian relics would be protected.

Recreational ORV use would be foregone on the 87,400 acres designated wilderness and 100 visitor days on the ways would be foregone annually. This shift in use would have a negligible effect on surrounding public lands.

Alternative B (No Wilderness)

Under the No Wilderness Alternative, the 87,400 acres of the Antelope WSA would be recommended nonsuitable for wilderness designation.

The Antelope WSA's wilderness values of naturalness, solitude and outstanding opportunities for primitive and unconfined recreation would be reduced.

Special features of James Wild Horse Trap, pristine meadows and Indian artifacts would be more susceptible to degradation due to ORV use.

There would be an increase in off-road vehicle use within the WSA.

ROBERTS WSA (NV-060-541)

Proposed Action (All Wilderness)

Under the Proposed Action, the entire 15,090 acres of public land in the Roberts WSA would be recommended suitable for wilderness designation.

Wilderness values would be slightly enhanced on most of the 15,090 acres of the Roberts WSA. The natural arches, caves, fishable stream and waterfall and other scenic values would be preserved. The wilderness values of naturalness, and solitude would be lost on approximately 29 acres in the areas of mineral development.

There would be no impact on recreational off-road vehicle use.

No impact to development of precious metals resources would occur. Exploration would be foregone on 15,090 acres of the WSA.

Alternative B (No Wilderness)

The Roberts WSA's wilderness values of naturalness and outstanding opportunities for solitude would be lost. The natural arches, caves, fishable stream and waterfall and other scenic values would be susceptible to degradation by actions of mineral exploration and development and ORV use.

Recreational ORV use would remain below 130 visitor days annually. There would be a slight increase in recreational ORV use.

There would probably be an acceleration of exploration and development of barite and precious metals resources in the Roberts WSA.

SIMPSON PARK WSA (NV-060-428)

Proposed Action (No Wilderness)

Under the proposed action, the entire 49,670 acres of the Simpson Park would be recommended nonsuitable for wilderness designation.

> The Simpson Park WSA's wilderness values of naturalness, and outstanding opportunities for solitude would be lost due to mineral exploration and development and ORV use.
>
> There would be no impact on recreational ORV use.
>
> There would probably be an acceleration of exploration and development of precious metals resources on about 31,000 acres in the Simpson Park WSA.

Alternative A (All Wilderness)

Under the All Wilderness Alternative, the entire 49,670 acres of public land in the Simpson Park WSA would be recommended suitable for wilderness designation.

> Wilderness values would be slightly enhanced on most of the 49,670 acres of the Simpson Park WSA. The wilderness values of naturalness and solitude would be lost on approximately 19 acres in the areas of mineral development.
>
> Recreational ORV use of 130 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.
>
> No impact to development of precious metals resources would occur. Exploration would be foregone on about 31,000 acres of the WSA.

Alternative B (No Wilderness)

This alternative is the same as the Proposed Action for this WSA.

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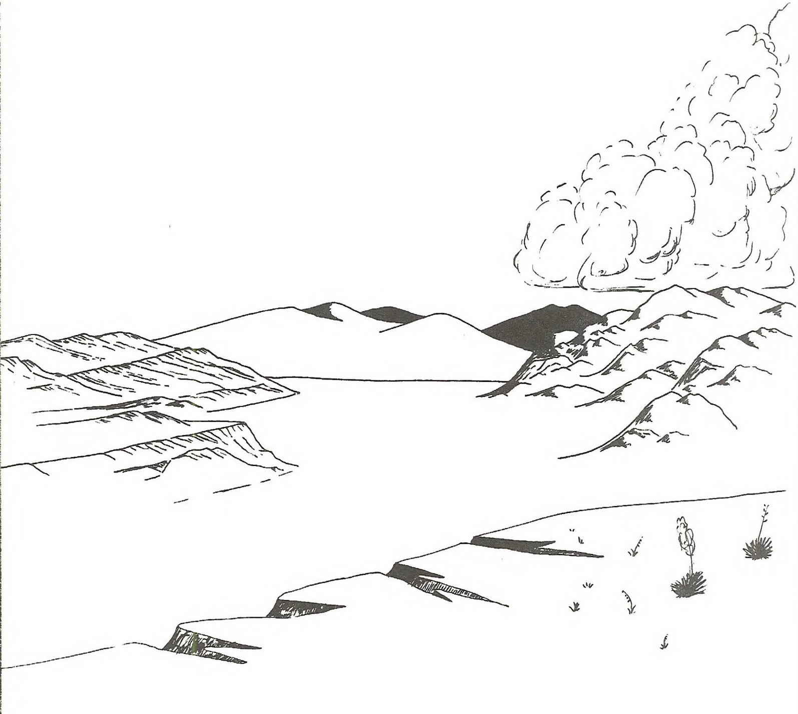

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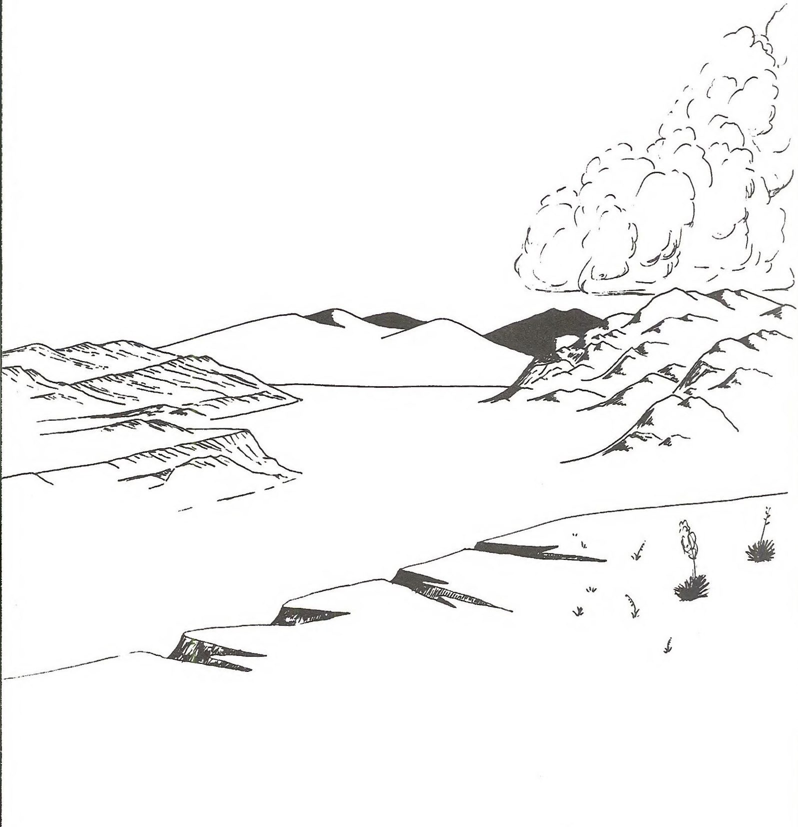
CHAPTER 1

Introduction and Planning Process



CHAPTER 1

INTRODUCTION AND PLANNING PROCESS

PURPOSE AND NEED FOR ACTION

The purpose of the Proposed Action is to manage and preserve the wilderness characteristics on 98,190 acres of public land in the Shoshone-Eureka Resource Area, Battle Mountain District. "To secure for the American people of present and future generations, the benefits of an enduring resource of wilderness" (Wilderness Act 1964). Approximately 54,470 acres would be released to management under multiple use for purposes other than preservation as wilderness.

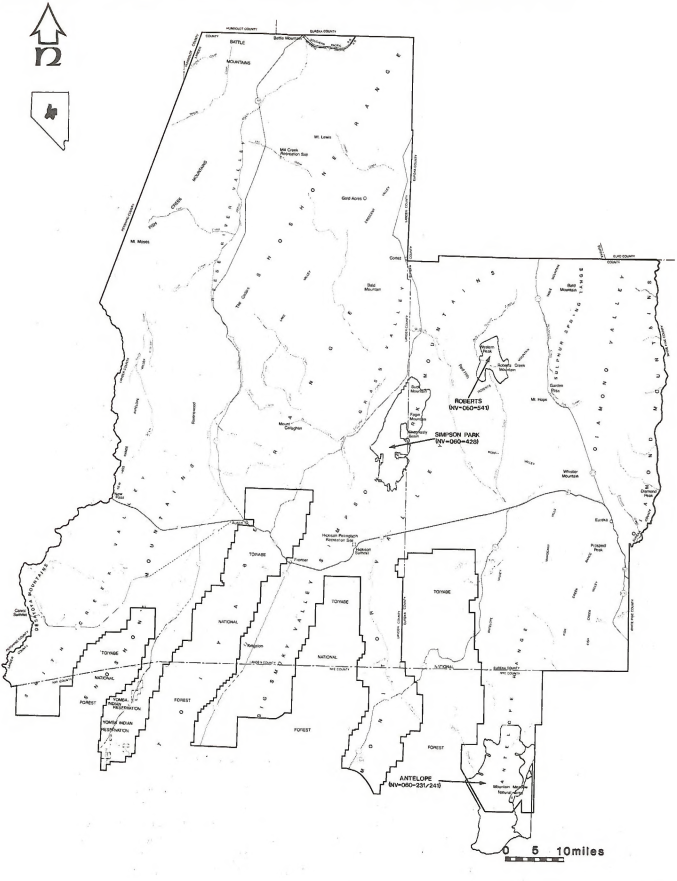
This EIS assesses the environmental consequences of managing the three WSAs as wilderness and nonwilderness, and the Antelope WSA as partial wilderness. This planning effort is needed to select and establish a resource of wilderness values for inclusion in the National Wilderness Preservation System.

The Federal Land Policy and Management Act of 1976 (FLPMA) directs the Bureau of Land Management (BLM) to manage the public lands and their resources under the principles of multiple use and sustained yield. Section 603 of FLPMA requires a wilderness review of BLM roadless areas of 5,000 or more acres and roadless islands. The BLM inventory process identified Wilderness Study Areas (WSAs) which have the mandatory wilderness characteristics of size, naturalness, and opportunities for solitude and/or primitive recreation. Suitable or nonsuitable wilderness recommendations for each WSA will be presented to the President by the Secretary of the Interior. The President will then make recommendations to the Congress. Areas can be designated wilderness only by an act of Congress. If designated as wilderness, an area would be managed in accordance with the Wilderness Act of 1964.

The three WSAs being studied are covered by the Shoshone-Eureka Resource Management Plan (RMP). Therefore, designating any of the Wilderness Study Areas as wilderness would be in conformance with the land use plan as it is currently written. It will not be necessary to amend the resource management plan if Congress officially designates any of the Wilderness Study Areas as wilderness.

LOCATION

Located in central Nevada, the Bureau of Land Management's Battle Mountain District encompasses approximately 14 million acres, of which about 11 million acres are public lands administered by the Bureau of Land Management (BLM). The Battle Mountain District's Shoshone-Eureka Resource Area includes approximately 4.4 million acres of public land. The area includes three principle towns: Austin, Battle Mountain, and Eureka. It encompasses most of Lander and Eureka Counties and a portion of Nye County (see location Map). The three Wilderness Study Areas, totaling 152,160 acres of public land administered by the BLM, are located in the Shoshone-Eureka Resource Area.



U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management
SHOSHONE - EUREKA

LOCATION MAP

1987

ENVIRONMENTAL ISSUE IDENTIFICATION/SCOPING

The scoping process for the Shoshone-Eureka Wilderness EIS encompassed issues identified by the BLM staff, by the public during formal scoping comment periods, at public meetings held in Battle Mountain, Eureka and Reno (in May 1981), and from comments on the draft EIS by the public and by Federal, State and local agencies. During the scoping period, there was consultation with the Nevada State Historic Preservation Officer concerning the presence or absence of cultural resources in the WSAs that would be eligible for nomination for listing on the National Register of Historic Places. The United States Fish and Wildlife Service was consulted concerning the potential effects of wilderness designation on threatened or endangered species. The environmental issues identified for analysis in this EIS as a result of the scoping process are presented below for each WSA.

Antelope WSA

1. Impacts on Wilderness Values. The wilderness values of naturalness, opportunities for solitude, opportunities for primitive recreation, and various special features including the James Wild Horse Trap site, of the WSA would benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSAs not be designated wilderness.

2. Impacts on Recreational Off-Road Vehicle Use. Wilderness designation would eliminate the use of recreational off-road vehicles (ORVs) in the WSA. Eliminating this use would affect the availability of opportunities for ORV recreation and shift ORV uses currently occurring in the WSA to adjacent lands.

Roberts Mountain WSA

1. Impacts on Wilderness Values. The wilderness values of naturalness, opportunities for solitude, opportunities for primitive recreation, and various special features of the WSA would benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSAs not be designated wilderness.

2. Impacts on Recreational Off-Road Vehicle Use. Wilderness designation would eliminate the use of recreational off-road vehicles (ORVs) in the WSA. Eliminating this use could affect the availability of opportunities for ORV recreation and shift ORV uses currently occurring in the WSA to adjacent lands.

3. Impacts on Development of Mineral Resources. Wilderness designation could affect the development of potential and known mineral resources by withdrawing designated lands from mineral entry. Development of existing minerals resources with designated wilderness areas could be affected by wilderness management restrictions.

Simpson Park WSA

1. Impacts on Wilderness Values. The wilderness values of naturalness, opportunities for solitude, opportunities for primitive recreation, and various special features of the WSA would benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSAs not be designated wilderness.

2. Impacts on Recreational Off-Road Vehicle Use. Wilderness designation would eliminate the use of recreational off-road vehicles (ORVs) in the WSA. Eliminating this use would affect the availability of opportunities for ORV recreation and shift ORV use currently occurring in the WSA to adjacent lands.

3. Impacts on Development of Mineral Resources. Wilderness designation could affect the development of potential and known mineral resources by withdrawing designated lands from mineral entry. Development of existing minerals resources within designated wilderness areas could be affected by wilderness management restrictions.

ISSUES CONSIDERED BUT DROPPED FROM FURTHER ANALYSIS

Under the guidance of the CEQ Regulations (Sec. 1501.7) these proposals were scoped for development of the EIS. The following issues or concerns were identified in scoping but they were not selected for detailed analysis in this EIS because for various reasons were found to be of lessor significance than those selected as very important to the decision process. After careful consideration of each, the degree of concern, environmental effect, or relevance was not significant enough to justify further intensive study. The reasons for not analyzing these issues in depth are discussed below:

The following issues were dropped from further consideration in all WSAs:

1. Impact of wilderness designation on reintroduction of bighorn sheep. The Nevada Department of Fish and Game has noted that bighorn sheep could be reintroduced in some of the WSAs. The Wilderness Management Policy provides guidelines for reintroduction of native species into WSAs, therefore designation would not affect reintroduction. Since potential reintroduction efforts are speculative, this issue was not considered environmentally of major importance and therefore was not selected for analysis.

2. Economic impact on livestock operations. Concerns were raised that wilderness designation would require modified livestock operations, causing significant economic hardships for the livestock industry. Since the Wilderness Management Policy provides for continuing livestock operations at historic levels, subject to reasonable controls, changes in the permitting policy are unlikely. There are no impacts of wilderness designation on livestock operators as a result of constraints on planned range developments.

3. Impact on Cultural Resources. Inventories and consultation with the State Historic Preservation Officer during scoping determined that there are no cultural sites which exist in the WSAs that qualify as National Register Sites other than the James Wild Horse Trap which is analyzed as a special feature in the Antelope WSA (see impacts on Wilderness Values for Antleope WSA). There are no historic or archaeological sites which would be affected by designation or nondesignation of wilderness. Therefore, the issue of impact to cultural resources from wilderness designation was dropped from further analysis.

4. Impact on Water Quality. The issue of how water quality would be affected by wilderness designation or nondesignation in each of the WSAs was identified in early scoping discussion. Water quality will be maintained or improved in accordance with State and Federal standards on existing or projected land-use plans as a matter of BLM policy. Management actions on public land within watersheds will be designed to protect water quality. It is not anticipated that designation or nondesignation of wilderness would affect these actions to any appreciable degree and therefore would not signficantly alter water quality within the WSA.

5. Impacts on Endangered Species. Wildlife and vegetation inventories and consultation with the U.S. Fish and Wildlife Service did not identify any threatened or endangered species in the WSAs. *Asclepias eastwoodiana* is not on the list of threatened or endangered species, but is a sensitive plant. This plant is found just outside the Antelope WSA on the southwest corner. However, no projects or activities planned within the WSA would affect the area where this plant is located.

6. Impacts on livestock and range management. Concerns were raised that wilderness designation may require changes in livestock and range management. Wilderness designation would result in no changes in AUMs, land use, or planned range improvements or developments. There would be no environmental impact on livestock and range management from wilderness designation or nondesignation. This issue was not analyzed in this document.

7. Development of Mineral Resource - Antelope WSA. Because no mining claims or mineral exploration is present or anticipated in the Antelope WSA, the impacts on the development of mineral resources is not analyzed for the Antelope WSA.

The following issue is not an environmental issue, but is a program concern that was frequently identified as an issue during scoping.

The WSAs being studied are not what Congress intended to be included in the National Wilderness Preservation System. Some or all of the areas being studied for Wilderness designation may not be the kind of area Congress intended to have considered for wilderness. This issue was dropped since it was determined in the inventory stage of the BLM's wilderness review process that all the WSAs being studied meet the minimum standards for wilderness identified by the Congress in the Wilderness Act of 1964 and FLPMA of 1976.

THE PLANNING PROCESS, SELECTION OF THE PROPOSED ACTION, AND DEVELOPMENT OF ALTERNATIVES

The Planning Process and Selection of the Proposed Action

Development of the Proposed Action is guided by requirements of the Bureau's Planning Regulations, 43 Code of Federal Regulations (CFR), part 1600. The BLM's Wilderness Study Policy (published February 3, 1982, in the Federal Register) supplements the planning regulations by providing the specific factors to be considered in developing suitability recommendations during the planning sequence.

The Proposed Action recommends areas as suitable for wilderness designation where the wilderness values and multiple resource benefits associated with wilderness designation, such as the protection of cultural resource, watersheds, and wildlife habitat, are capable of balancing the benefits of other resource values and uses which could be foregone due to wilderness designation. All areas recommended as suitable for wilderness under this alternative can be managed as wilderness over the long-term.

If the Proposed Action were to be implemented two Wilderness Study areas would be recommended suitable for wilderness designation. The acreages in each WSA recommended suitable and nonsuitable for wilderness designation are as follows:

WSA	Acres Suitable	Acres Nonsuitable
Antelope	83,100 (a)	4,800
Roberts Mountain	15,090	0
Simpson Park	0	49,670
Total	98,190	54,470

(a) Includes 500 acres added to original WSA to enhance manageability.

Alternatives to the Proposed Action Selected for Analysis

The BLM Wilderness Study Policy calls for the formulation and evaluation of alternatives ranging from resource protection to resource production. The alternatives assessed in this EIS include: (1) a No Wilderness alternative for each WSA, (2) an All Wilderness alternative for each WSA, (3) and, a Partial alternative for the Antelope WSA.

To reduce confusion of names of the alternatives used in the draft, the alternatives in this document have been given an alphabetic character. The equivalents are:

Alternative A is used instead of All Wilderness (Protection Alternative);
Alternative B is used instead of No Wilderness (No Action Alternative).

Alternative B, the No Wilderness Alternative, and the No Action Alternative as required by the National Environmental Protection Act, are equivalent. Both advocate management as outlined in the existing land use plan and recommendation of the WSAs as nonsuitable for wilderness.

Alternative A, the All Wilderness Alternative represents the maximum possible acreage that could be recommended as suitable for wilderness designation.

In the Draft RMP/EIS, the Emphasis on Economic Development Alternative emphasized commodity production and use of areas having significant resource development potential. This would mean recommending as nonsuitable for wilderness designation all areas with good or high mineral potential ratings. This alternative was selected as the Proposed Action for the Antelope WSA.

Outlines below are the Proposed Action and Alternatives developed for each of the WSAs:

Antelope WSA

The Proposed Action for the Antelope WSA is Partial Wilderness. Under this proposal 83,100 acres would be designated wilderness. The eastern fan portion of the WSA, totaling 4,800 acres, would not be designated wilderness but would be managed for multiple use as described in this document and in the Shoshone-Eureka Resource Area RMP.

Two alternatives were also considered; an All Wilderness Alternative which would designate all 87,400 acres as wilderness (the maximum possible acres that could be recommended) and the No Wilderness Alternative (none of the 87,400 acres would be designated wilderness but would be managed for multiple use under the Shoshone-Eureka Resource Area RMP).

Roberts WSA

The Proposed Action for the Roberts WSA is All Wilderness. Under this proposal, 15,090 acres would be designated wilderness.

One alternative was also considered; Under the No Wilderness Alternative, none of the 15,090 acres would be designated wilderness but would be managed for multiple use under the Shoshone-Eureka Resource Area RMP.

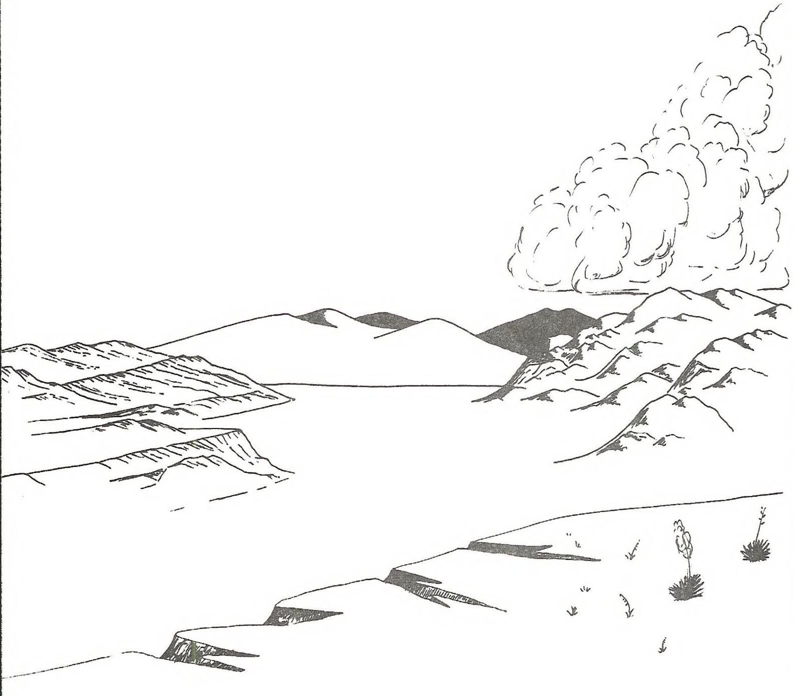
Simpson Park WSA

The Proposed Action for the Simpson Park WSA is the same as Alternative B (No Wilderness). Under this proposal, none of the 49,670 acres would be designated as wilderness but would be managed for multiple use, as described in part in this document and in detail in the Shoshone-Eureka Resource Area RMP.

One alternative was also considered; an All Wilderness Alternative which would designate all 49,670 acres as wilderness (the maximum possible acreage that could be recommended).

CHAPTER 2

Proposed Action and Alternatives



CHAPTER 2

PROPOSED ACTION AND ALTERNATIVES

Since the pattern of future actions within the WSAs cannot be predicted with certainty, assumptions were made to allow the analysis of impacts under the Proposed Action and alternatives. These assumptions are the basis for the impacts identified in this EIS. They are not management plans or proposals, but represent feasible patterns of management activities which could occur under the alternatives analyzed.

ANTELOPE (NV-060-231/241)

Proposed Action (Partial Wilderness)

A portion of the Antelope WSA, 83,100 acres, would be recommended suitable for wilderness designation. The remaining 4,800 acres along the eastern boundary of the WSA would be recommended nonsuitable for wilderness designation.

Recreational Off-Road Vehicle Use

The 83,100-acre parcel recommended as suitable for wilderness designation, including 7 miles of ways or trails, would be closed to recreational ORV use. Five miles of cherrystem roads would remain open to recreational ORV use. Current ORV use of 220 visitor days annually would continue on the cherrystem roads.

The 4,800-acre parcel recommended nonsuitable including 9 miles of ways or trails would remain open for ORV use. Projection estimates indicate that recreational ORV use would increase slightly (less than 10 percent), but would remain below 100 visitor days annually.

Other Recreation

The Antelope WSA would be open for non-motorized hunter use. Current use is estimated at about 200 visitor days per year within the WSA and is expected to remain at that level in the foreseeable future. No recreation facilities or trails exist in the WSA. Development of recreation facilities is not anticipated.

Alternative A (All Wilderness)

All 87,400 acres of public land in the Antelope WSA would be recommended as suitable for wilderness designation.

Recreational Off-Road Vehicle Use

The Antelope WSA would be closed to recreational ORV use. Five miles of cherrystem roads would remain open. Sixteen miles of ways would be closed to recreational ORV use. This action would eliminate approximately 100 visitor days of recreational ORV use that are estimated to occur on the ways at present.

Other Recreation

The Antelope WSA would be open for non-motorized hunter use. Recreational use for this activity would not change, but would remain at the same level of 200 hunter days annually for the foreseeable future. No recreation facilities or trails exist in the WSA and none are planned. Development of recreation facilities is not anticipated because of the low use the area receives.

Alternative B (No Wilderness)

All 87,400 acres of public land in the Antelope WSA would be recommended as nonsuitable for wilderness designation.

Recreational Off-Road Vehicle Use

The lands within the WSA would remain open to recreational ORV use. Approximately 220 visits of ORV use occurs annually on the five miles of cherrystem roads. This use is expected to increase (about 20%) to about 270 visits per year in the foreseeable future.

There are approximately 16 miles of vehicle ways within the boundary of the WSA which receive 100 visitor days of ORV use annually. No other development of roads or ways is anticipated because of the low use the area receives.

Other Recreation

The Antelope WSA would be open for management of non-motorized recreation use. Current use is estimated at about 200 hunter days per year within the WSA, and is expected to remain at that level in the foreseeable future. No recreation facilities or trails exist in the WSA. Development of recreation facilities is not anticipated.

ROBERTS WSA (NV-060-541)

Proposed Action (All Wilderness)

All 15,090 acres of public land in the Roberts WSA would be recommended as suitable for wilderness designation. This alternative is the same as Alternative A for this WSA.

Recreation Off-Road Vehicle Use

The Roberts WSA including 2.5 miles of ways, would be closed to recreational ORV use. Recreational ORV use of 100 visitor days, estimated to occur in the area annually, would continue on two miles of cherrystemmed road.

Other Recreation

The Roberts WSA would be open for non-motorized recreation activities including hunting, horseback riding, camping, hiking and rock and mountain climbing. Current use is estimated at about 100 visitor days per year within the WSA, and is expected to increase to 130 per year in the foreseeable future. Hunting visits are currently estimated to be about 90 visitor days and are expected to increase to 125 visits per year in the foreseeable future. No recreation facilities or trails exist in the WSA. Development of recreation facilities is not anticipated because of the low use the area receives.

Mineral Resource Actions

Subject to valid existing rights, the Roberts WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on mining claims, which have plans of operation that are presently located within the WSA. Two mineral developments of the 198 mining claims that currently exist in the WSA are anticipated.

1. A small open pit precious metals mine is anticipated on the border of the WSA in the Vinini Creek area. The access would be from outside the WSA. Road construction of two miles is anticipated inside the WSA. Nineteen acres inside the WSA would be disturbed with about three acres of mine, six acres of tailings, three acres of mill and three acres of road.

2. A small open pit precious metals mine is anticipated on the border of the WSA in the Vinini Creek Area. Access would be from Vinini Creek. About ten acres inside the WSA would be disturbed including about two acres for the mine, three acres for tailings, and one and a half acres of road (one mile).

Potential for development of other locatable minerals is low because of low favorability for occurrence. Potential for development of saleable minerals is low because of the distance to markets.

The WSA is classified as having a low favorability for oil and gas occurrence. There are two oil and gas leases covering about 800 acres. No development is expected within the WSA.

Alternative B (No Wilderness)

All 15,090 acres of public land in the Roberts WSA would be recommended as nonsuitable for wilderness designation.

Recreational Off-Road Vehicle Use

The lands within the WSA would remain open to recreation ORV use. Approximately 100 visitor days of ORV use occurs annually within the WSA. This use is expected to increase to 130 visitor days per year in the foreseeable future.

There are two miles of cherrystem roads that protrude into the WSA and 2.5 miles of vehicle ways within the boundary of the WSA. These would be managed to provide for recreational ORV use up to 130 visitor days annual. No other development of roads or ways is anticipated because of the low use the area receives.

Other Recreation

The Roberts WSA would be managed to provide for other recreation activities in addition to recreation ORV use. These activities would include hunting, hiking, rock and mountain climbing, horseback riding and camping. Current use is estimated at about 100 visitor days per year within the WSA. These recreation visits are expected to increase to 130 visitor days per year in the foreseeable future. Hunting visits are currently estimated to be about 90 visitor days and are expected to increase to 125 visits per year in the foreseeable future. No recreation facilities or trails exist in the WSA. Development of recreation facilities is not anticipated.

Mineral Resource Actions

A high level of mineral exploration and development activity is anticipated in the first few years if the area is not designated wilderness. It is projected there would be five Notices of Intent per year for the first few years. Based on past experience, it is expected that each project would have up to two miles of road and eight pads for a total disturbed area of five acres. The total disturbance in the WSA is expected to be less than 5,000 acres. The results of this exploration will determine the overall impact on the WSA in the future.

Although there are no known discoveries, some development of the 198 existing mining claims located in the WSA is anticipated. Geochemical analyses in the Vinini Creek area indicate high favorability for metallic minerals within the WSA. It is assumed that there would be two discoveries:

1. A small open pit precious metals mine is anticipated on the border of the WSA in the Vinini Creek area. The access would be from outside the WSA. Road construction of two miles is anticipated inside the WSA. Nineteen acres total inside the WSA will be disturbed with about three acres of mine, six acres of tailings, three acres of mill and three acres of road.

2. A small open pit precious metals mine is anticipated on the border of the WSA in the Vinini Creek area. Access would be from Vinini Creek. About ten acres total inside the WSA would be disturbed including about two acres for the mine, three acres for tailings, and one and a half acres of road (one mile).

Potential for development of other locatable minerals is low because of low favorability for occurrence. Potential for development of saleable minerals is low because of the distance to markets.

The WSA is classified as having a low potential for oil and gas occurrence. There are two oil and gas leases covering about 800 acres. No development of these is anticipated due to lack of industry interest, distance from markets, and the availability of better potential resources outside of the WSA.

SIMPSON PARK (NV-060-428)

Proposed Action (No Wilderness)

All 49,670 acres of public land in the Simpson Park WSA would be recommended as nonsuitable for wilderness designation. This alternative is the same as Alterntive B for this WSA.

Recreational Off-Road Vehicle Use

The lands within the WSA would remain open to recreation ORV use. Approximately 130 visitor days of ORV use occur annually within the WSA. This use is expected to increase to 160 visitor days per year in the foreseeable future.

There are 30 miles of vehicle ways within the boundary of the WSA which provide access for ORV enthusiasts. No other development of roads or ways is anticipated because of the low use the area receives.

Other Recreation

The Simpson Park WSA would be open for management of non-motorized recreation use. Current use is estimated at about 120 hunter days per year within the WSA, and is expected to increase to 160 per year in the foreseeable future. No recreation facilities or trails exist in the WSA. Development of recreation facilities is not anticipated.

Mineral Resource Actions

A high level of exploration and development activity is anticipated in the first few years if the area is not designated wilderness. It is projected there would be five Notices of Intent per year for the first few years. Based on past experience, it is expected that each project would have up to two miles of road and eight pads for a total disturbed area of five acres. The total disturbance in the WSA due to exploration is expected to be 25 acres per year or less than 3,100 acres in the forseeable future. The results of this exploration would determine the overall impact on the WSA in the future.

Although there are no known discoveries, some development of the 105 existing mining claims located in the WSA is anticipated. Geochemical analyses in the northern portion of the WSA indicate 4,500 acres with high favorability for metallic minerals within the WSA. It is assumed that there would be one discovery:

1. A small open pit precious metals mine on the border of the WSA in the Shagnasty Basin area. The access would be from outside the WSA. Two miles of road construction is anticipated inside the WSA. About nineteen acres total inside the WSA would be disturbed with about three acres of mine, five acres of tailings, five acres of mill site and three acres of road.

Potential for development of other locatable minerals is low because of low favorability for occurrence. Potential for development of saleable minerals is low because of the distance to markets.

The WSA is classified as having a low favorability for oil and gas occurrence. No exploration or development is anticipated due to lack of interest, distance from markets, and the availability of better potential resources outside of the WSA.

Alternative A (All Wilderness)

All 49,670 acres of public land in the Simpson Park WSA would be recommended as suitable for wilderness designation.

Recreational Off-Road Vehicle Use

The Simpson Park WSA would be closed to recreational ORV use. Approximately 120 visitor days which occur annually within the WSA would be foregone.

Other Recreation

The Simpson Park WSA would be open for non-motorized hunter use. Recreational use for this activity would not change, but would remain at the same level of 120 hunter days annually for the foreseeable future. No recreation facilities or trails exist in the WSA and none are planned. Development of recreation facilities is not anticipated because of the low use the area receives.

Mineral Resources Actions

Subject to valid existing rights, the Simpson Park WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on mining claims which have plan of operations filed at the time of designation, in accordance with existing regulations.

Although there are no known discoveries, some development of the 105 existing mining claims located in the WSA is anticipated. Geochemical analyses in the northern portion of the WSA indicate 4,500 acres with high favorability for metallic minerals within the WSA. It is assumed that there would be one discovery.

1. A small underground gold mine on the border of the WSA in the Shagnasty Basin area. The access would be from outside the WSA. Two miles of road construction are anticipated inside the WSA. About nineteen acres total inside the WSA would be disturbed with about three acres of mine, five acres of tailings, five acres of mill site and three acres of road.

Potential for development of other locatable minerals is low because of low favorability for occurrence. Potential for development of saleable minerals is low because of the distance to markets.

COMPARATIVE SUMMARY TABLE OF IMPACTS
ALTERNATIVES

ENVIRONMENTAL Issue	PROPOSED ACTION (Partial Wilderness)	ALTERNATIVE A (All Wilderness)	ALTERNATIVE B (No Wilderness)
		ANTELOPE	
Impact on Wilderness Values	On 83,100 acres designated as wilderness, the area's naturalness and opportunities for primitive and unconfined recreation and solitude would be retained. Special features in the suitable portion consisting of the James Wild Horse Trap, pristine spring meadows and Indian relics would be protected. On the 4,800 acres not designated wilderness, there would not be a significant impact to naturalness and opportunities for solitude.	On 87,400 acres of the WSA, there would be a slight improvement of the area's naturalness solitude and opportunities for primitive and unconfined recreation because approximately 100 visitor days would be eliminated. Special features of James Wild Horse Trap, pristine spring meadows and Indian relics would be protected.	The Antelope WSA's wilderness values of naturalness, solitude and outstanding opportunities for primitive and unconfined recreation would be reduced. Special feature of James Wild Horse Trap, pristine meadows and Indian artifacts would be more susceptible to degradation due to ORV use.
Impact on Recreational ORV Use	The 83,100 acres would be closed to recreational ORV use in the designated wilderness, however five miles of cherrystem roads would remain open to recreational ORV use. This would not change the amount of use which occurs at present.	Recreational ORV use would be foregone on the 87,400 acres designated wilderness and 100 visitor days would be foregone annually. This shift in use would have a negligible effect on surrounding public lands.	There would be an increase in off-road vehicle use within the WSA.

COMPARATIVE SUMMARY TABLE OF IMPACTS
ALTERNATIVES

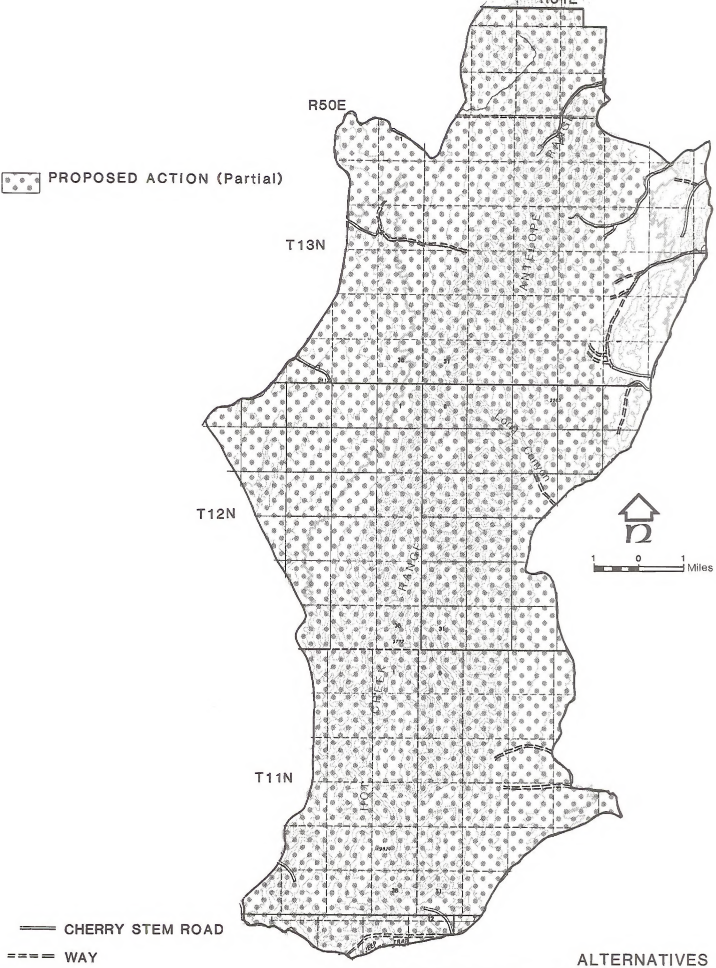
ENVIRONMENTAL Issue	PROPOSED ACTION (Partial Wilderness)	ALTERNATIVE A (All Wilderness)	ALTERNATIVE B (No Wilderness)
	ANTELOPE (continued)		
	On the 4,800 acres of the WSA not designated wilderness, recreational ORV use would continue to increase slightly, but would not exceed 100 visitor days annually for the foreseeable future.		

COMPARATIVE SUMMARY TABLE OF IMPACTS
ALTERNATIVES

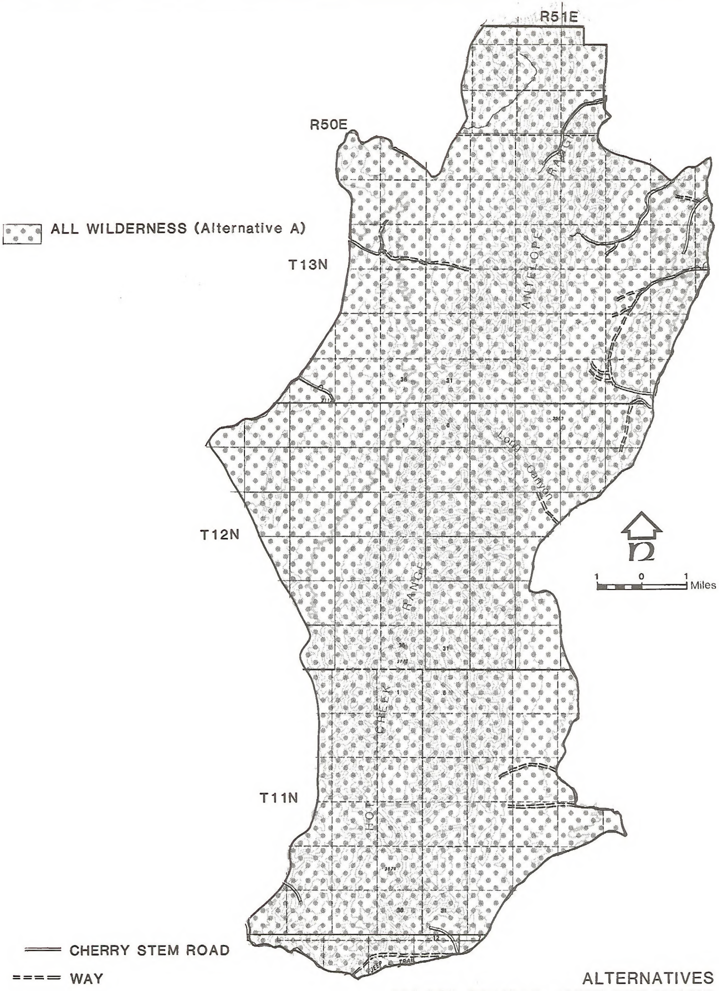
ENVIRONMENTAL Issue	PROPOSED ACTION (All Wilderness)	ALTERNATIVE A (All Wilderness)	ALTERNATIVE B (No Wilderness)
		ROBERTS	
Impact on Wilderness Values	Wilderness values would be slightly enhanced on most of the 15,090 acres of the Roberts WSA. The natural arches, caves, fishable stream and waterfall and other scenic values would be preserved. The wilderness values of naturalness, and solitude would be lost on approximately 29 acres in the areas of mineral development.	Same as Proposed Action.	The Roberts WSA wilderness values of naturalness and outstanding opportunities for solitude would be lost on 29 acres within the WSA. The natural arches, caves, fishable stream and waterfall and other scenic values would be susceptible to degradation by actions of mineral exploration and development and ORV use.
Impact on Recreational ORV Use	There would be no impact on recreational off-road vehicle use.		Recreational ORV use would remain below 130 visitor days annually. There would be a slight increase in recreational ORV use.
Impact on Development of Mineral Resources	No impact to development of precious metals resources would occur. Exploration would be foregone on 15,090 acres of the WSA.		There would probably be an acceleration of geothermal exploration and development of precious metals resources in the Roberts WSA.

COMPARATIVE SUMMARY TABLE OF IMPACTS
ALTERNATIVES

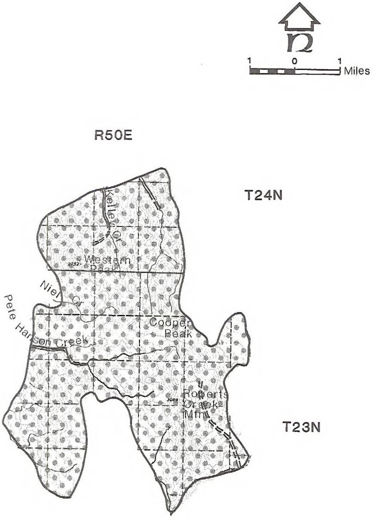
ENVIRONMENTAL Issue	PROPOSED ACTION (No Wilderness)	ALTERNATIVE A (All Wilderness)	ALTERNATIVE B (No Wilderness)
		SIMPSON PARK	
Impact on Wilderness Values	The Simpson Park WSA's wilderness values of naturalness and outstanding opportunities for solitude would be lost due to mineral exploration on 25 acres per year, development on 19 acres and continued ORV use.	Wilderness values would be slightly enhanced on most of the 49,670 acres of the Simpson Park WSA. The wilderness values of naturalness, and solitude would be lost on approximately 19 acres in the areas of mineral development.	Same as Proposed Action.
Impact on Recreational ORV Vehicle Use	There would be no impact on recreational ORV use.	Recreational ORV use of 130 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.	
Impact on Development of Mineral Resources	There would probably be an acceleration of exploration and development of barite and precious metals resources on about 3,100 acres in the Simpson Park WSA.	No impact to development of precious metals resources would occur. Exploration would be foregone on 3,100 acres of the WSA.	



ALTERNATIVES
NV-060-231/241 ANTELOPE RANGE



ALTERNATIVES
NV-060-231/241 ANTELOPE RANGE

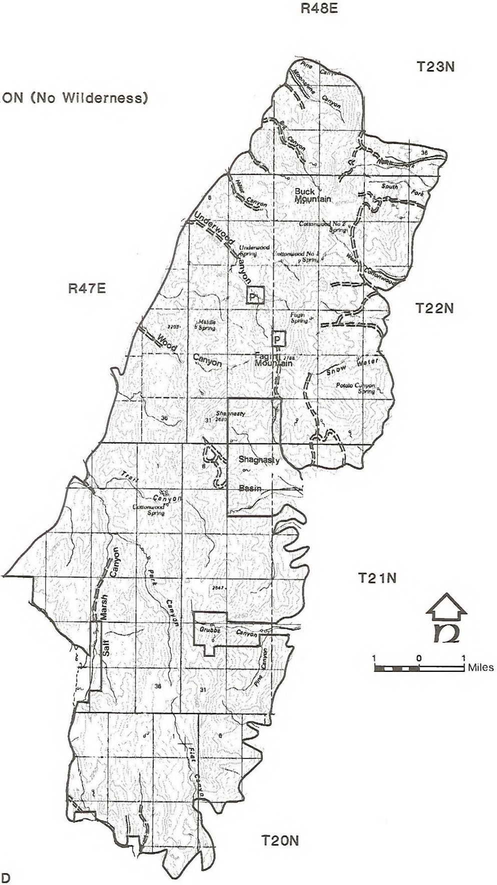


▨ PROPOSED ACTION (All Wilderness)

═══ CHERRY STEM ROAD

== == WAY

ALTERNATIVES
NV-060-541 ROBERTS MOUNTAIN

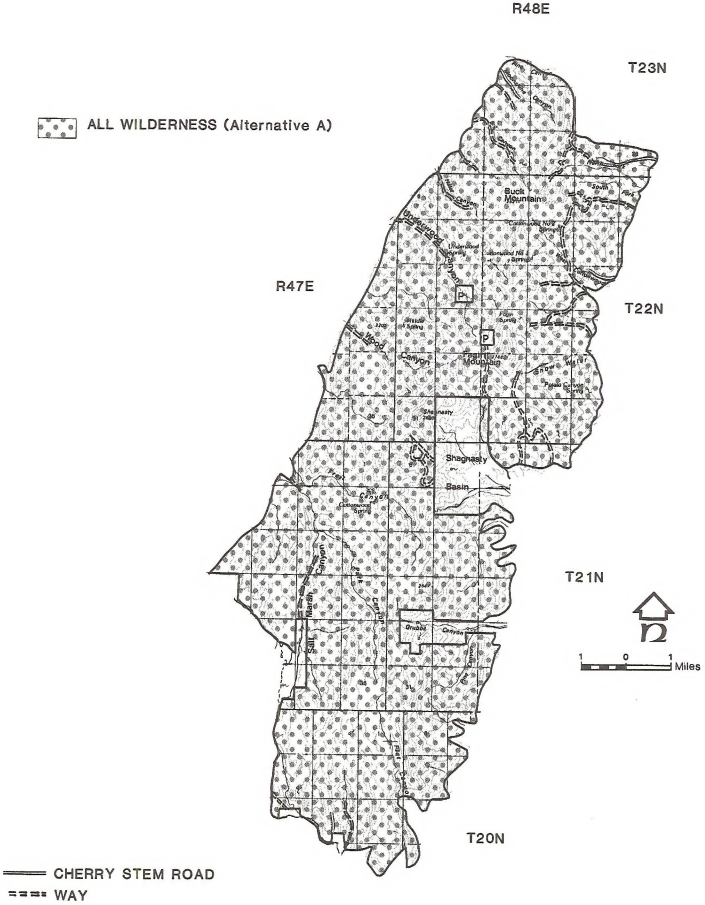


☐ PROPOSED ACTION (No Wilderness)

═══ CHERRY STEM ROAD

==== WAY

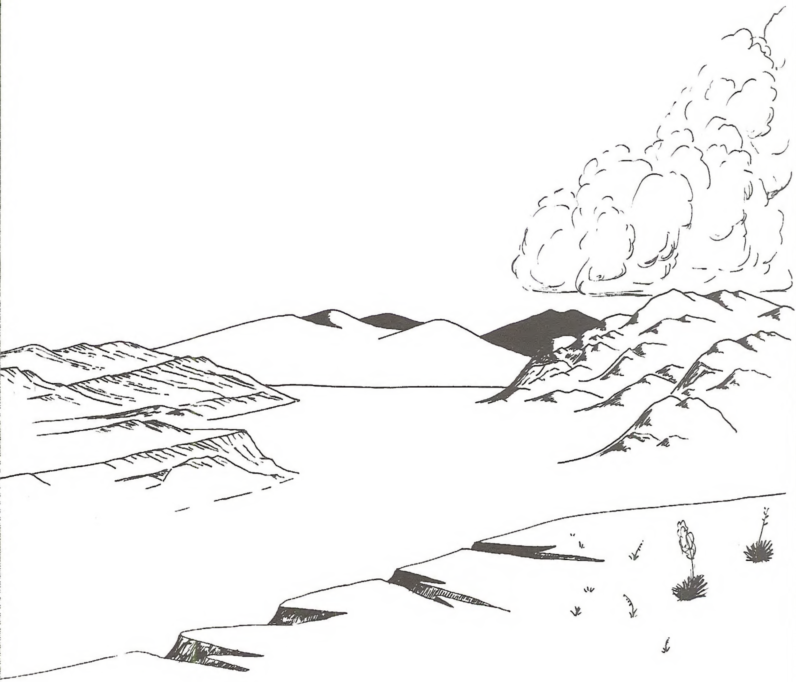
ALTERNATIVES
NV-060-428 SIMPSON PARK



ALTERNATIVES
NV-060-428 SIMPSON PARK

CHAPTER 3

Affected Environment



CHAPTER 3

AFFECTED ENVIRONMENT

ANTELOPE WSA NV-060-231/241

General Characteristics

The Antelope Wilderness Study Area is located in the Antelope Range and contains approximately 87,400 acres of public land, about 2 percent of the resource area. It is oval shaped, approximately twenty-five miles long and eight miles wide with an average elevation differential of about two thousand feet. The size of the area contributes significantly to the diversity of landform, vegetation types, and wilderness characteristics within the unit.

Wilderness Values

Naturalness: The area is generally free from human imprints and is in a natural state. The following imprints are substantially unnoticeable in the wilderness area as a whole: thirteen ways totaling 16.5 miles, four water developments, a small seeding totaling approximately 300 acres in the northeast portion of the unit near Crested Wheat Ridge, five fences which protrude a short way into the unit, and a small enclosure in the southeast portion of the unit. All imprints are the result of livestock grazing operations and firewood cutting.

Opportunities for Solitude: The Antelope wilderness study area is in a very remote section of Nevada. Naturalness and opportunities for solitude are affected very little by outside sights and sounds. There are seven cherry-stemmed roads totaling 11 miles and other roads that follow the boundary around most of the unit, but these are, for the most part, unnoticeable from within the unit. Traffic on these roads is very light, and associated mainly with livestock grazing.

The unit contains outstanding opportunities for solitude. Located twenty miles from the nearest paved highway, the area is extremely remote and seldom visited. A mixture of diverse topography and vegetation combine to form excellent screening in the unit. In addition, size and topography combine to form almost unlimited secluded spots. The interior of the unit provides very limited motorized access ensuring seclusion to almost any degree sought.

Opportunities for Primitive and Unconfined Recreation: The area offers abundant opportunities for sustained high-elevation hiking and horseback riding, hunting, sightseeing, photography, and historical and archaeological study. These factors, in combination, offer outstanding opportunities for primitive and unconfined recreation within the wilderness study area.

Special Features: Untrampled spring meadows, uncommon in Nevada, occur in the southern portion of the unit. A group of Shoshone Indian wickiups, the James Wild Horse Trap - rows of pinyon and juniper piled together to form barriers for horses - (listed on the National Register of Historic Places), and many scattered archaeological sites exist in the unit. Being relatively undisturbed, these special features enhance the suitability of the area for wilderness designation.

Livestock

There are five livestock allotments located within the Antelope WSA: 7-mile, Snowball, Hicks Station, Morey and Wagon Johnnie. Three permittees share spring-summer-fall authorized use. Current use is estimated at about 4,900 AUMs within the WSA. In the spring, the cattle generally use the valley bottoms and fans and gradually work to the tops of the mountain ranges where they stay until fall. This pattern of use can vary depending on the availability of water, and the weather.

Recreation

The Antelope WSA offers abundant opportunities for sustained high-elevation hiking and horseback riding, hunting, sightseeing, photography, and historical and archaeological study. Virtually all recreation use occurs on weekends and holidays and involves vehicle use. The majority of vehicle use occurs on existing ways and roads.

Minerals

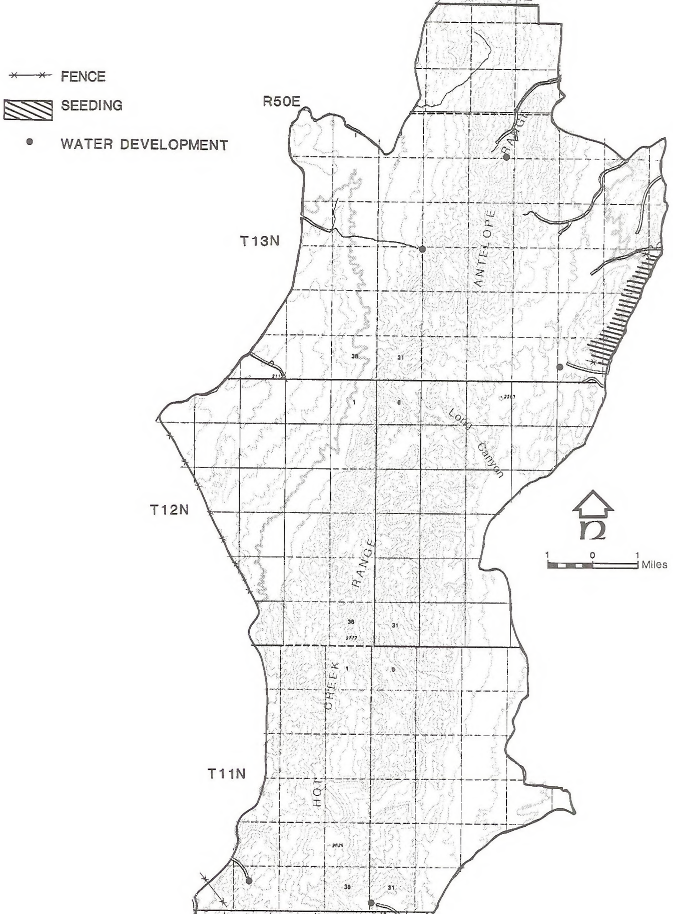
The Antelope WSA has been determined to have generally low potential for mineral resources with a low degree of confidence. There is low potential for locatable minerals based upon sketchy indirect evidence. Currently there are no mining claims within the WSA. Oil and gas potential is low, however, there are five post-FLPMA oil and gas lease covering 8,640 acres. The geothermal potential is rated as moderate based upon indirect evidence.

Wildlife Habitat

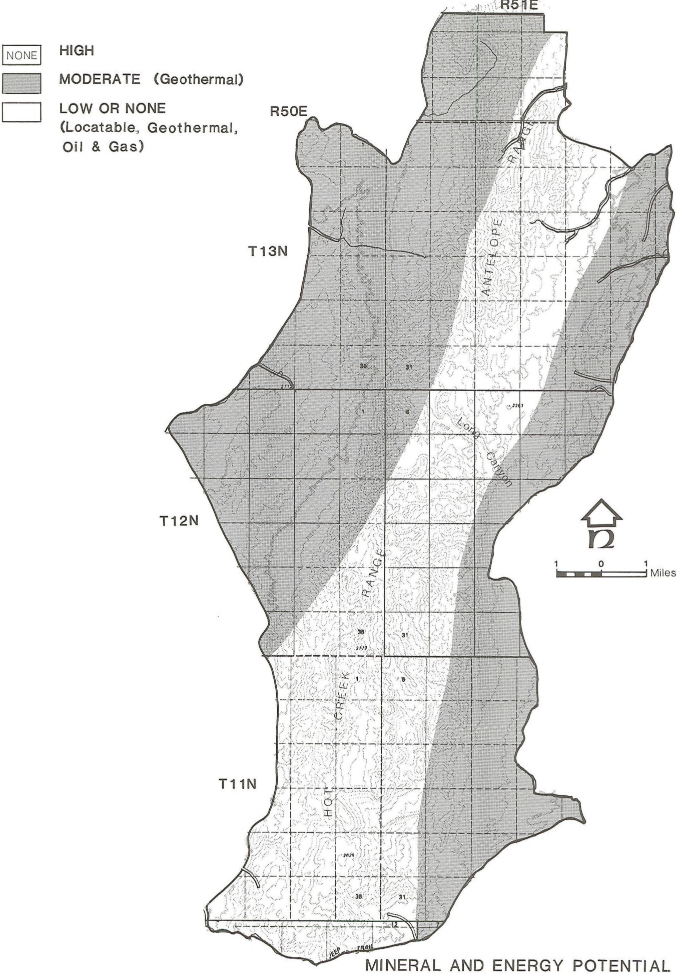
The Antelope WSA supports populations of mule deer year round, on approximately 72,000 acres of the WSA. The habitat condition is estimated to be fair. Although the deer numbers are generally down, based on long-term population trends, they have been increasing in recent years (Hess, 1981). This increase has been attributed to good fawn production, mild winters, and a hunter quota system implemented in 1975 (Tsukamoto, 1979, Hess, 1982).

Sage grouse use most of the Antelope WSA (95%).

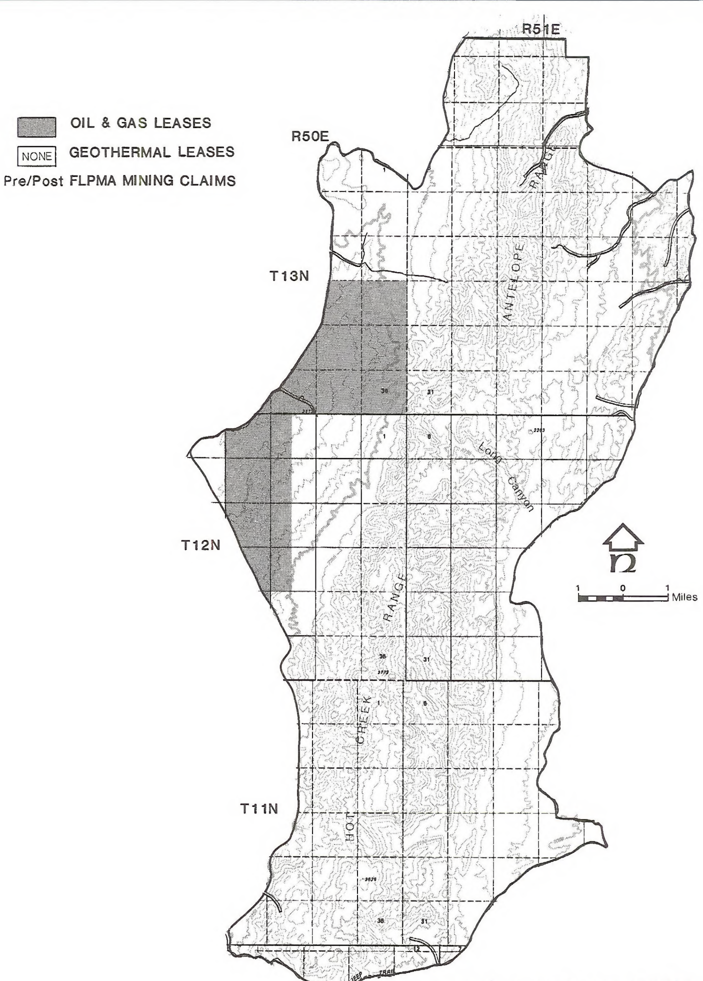
There are no fishable streams in the Antelope WSA and only 70 acres of wetland/riparian areas. There are no known threatened or endangered species in the WSA. Asclepias eastwoodiana is not on the list of threatened or endangered species but is a sensitive plant. This plant is found just outside the Antelope WSA on the southwest corner. However, no projects or activities planned within the WSA would be in the area or affect the area where this plant is located.



RANGE PROJECTS
NV-060-231/241 ANTELOPE RANGE



MINERAL AND ENERGY POTENTIAL
NV-060-231/241 ANTELOPE RANGE



MINING CLAIMS AND LEASES
NV-060-231/241 ANTELOPE RANGE

ROBERTS WSA (NV-060-541)

The Roberts wilderness study area is located in the Roberts Creek Mountains and contains approximately 15,090 acres of public land (approximately 0.3 percent of the resource area). It is oval shaped and surrounded on three sides by major valley systems. For the relatively small amount of acreage involved, the unit offers diverse features and characteristics not common in central Nevada.

Wilderness Values

Naturalness: The area is generally free from human imprints and is in a natural state. Those imprints present are substantially unnoticeable in the Roberts WSA as a whole. Five ways totaling 2.5 miles are in the unit. Three fences protrude into the unit. No known water developments are present. A small mining prospect was found on the western side of the unit, but is substantially unnoticeable in the area as a whole. The nature of the intrusions does not warrant their exclusion. For specific locations of these imprints, see the Roberts Imprint of Man map located in this chapter.

Ranches and roads outside the boundary are visible in the distance from certain points inside the Roberts WSA. These are considered minor and may add to the wilderness experience by giving one a sense of remoteness and isolation, and also by heightening the user's awareness and appreciation of the area's outstanding wilderness values in contrast to sights and sounds outside the wilderness area.

There are no existing major noise sources outside the unit that would have an affect upon the wilderness experience. The potential does exist for two new mining operations to start in the future near the Roberts WSA. Several roads form the boundary around portions of the unit. There may be vehicle sounds, but these would not adversely affect the wilderness character of the area. Currently, the roads are not heavily traveled.

Opportunities for Solitude: The unit contains outstanding opportunities for solitude. Spread over an extremely jagged and varied topography the unit is characterized by narrow, deep canyons forested with willow, cottonwood, aspen, birch, and dogwood trees. Barren rock ridges and isolated stands of mountain mahogany and limber pine combine with the canyons to offer abundant natural screening and offer many opportunities for the user to find a secluded spot. The Roberts WSA offers a wide diversity of terrain, vegetation and scenery. The massif consists of a series of rugged peaks forming a broken ridge. Numerous canyons and valleys surround the ridge breaking the unit into areas.

Late spring through late fall is the best time for travel in the area. August and September can be hot (90 to 100 degrees) at the lower elevations but the higher slopes are usually plesantly cool. Winter temperatures are extremely cold (very often sub-zero). High winds and almost perpetual clouds at the higher elevations make winter travel unadvisable except in the sheltered canyon bottoms. Snow depths at these lower elevations are usually sufficient for snow travel.

Opportunities for Primitive and Unconfined Recreation: The Roberts Creek/ Vinini Creek and the Dry Creek areas offer slopes of varying degrees and a variety of scenic attractions for cross-country skiing and snowshoeing. Suitable snow depths usually occur throughout this area.

Horseback riding is fairly easy throughout this area and access to the bowl just below the peak of Roberts Mountain is not difficult. For extended travel, one can climb out of the bowl and drop into the Pete Hansen or Dry Creek drainages.

The south side of the unit is steep and provides few opportunities to penetrate the unit. There are a number of small caves above Roberts Creek. Most are located on cliff faces and may require some degree of rock climbing ability. The rocks are Devonian sedimentaries with numerous fossils, but are crumbly.

The road along the south side of the unit provides access to the upper end of the south fork of Pete Hansen Creek and the routes previously discussed there.

Considering the small amount of acreage contained in the unit, the area offers a wide variety of special features. Much diversity in ecological features is found.

Because of its rapid change in elevation, the unit exhibits a variety of habitats in close proximity to one another. These include the northern desert shrub community, a pinyon-juniper tree forest, a sub-alpine herbacious/sage community, and a scattered boreal forest of limber pine. Open stands of mountain mahogany replace the pinyon/juniper forest and sub-alpine vegetation in some areas, primarily on south-facing slopes.

Special Features: The Roberts thrust, responsible for the mountain's existence, is one of the great structural features of the intermountain west. This provides for excellent geological study. Universities as far away as Ohio and Nebraska, and students from England have participated in geologic field trips and mapping exercises in the area during the summer months. The main scientific values of the area are its "window on the mantle" characteristic, a geological formation associated with the Roberts Mountain Thrust Fault, and the ecological island aspect of the higher elevations. The unit offers much scenic value and dominates the view for miles around. Western Peak, a rocky, high-elevation point, is an interesting formation, and offers scenic value from many observation points outside of the unit. A small perennial twenty-five foot waterfall occurs in the north fork of Pete Hansen Creek. Two small seasonal ponds are found on Roberts Creek Mountain. Numerous caves and at least one natural arch are found in the rock cliffs within the unit.

Livestock

There are two livestock allotments located within the Roberts WSA, JD Allotment and Roberts Mountain Allotment. Two permittees share spring-summer-fall authorized use. Current use is estimated at about 1,600 AUMs within the WSA. In the spring, the cattle generally use the valley bottoms and fans and gradually work to the tops of the mountain ranges where they stay until fall. This pattern of use can vary depending on the availability of water and the weather.

Recreation

The Roberts WSA offers abundant opportunities for sustained high-elevation hiking and horseback riding, hunting, sightseeing, photography, and historical and archaeological study. Virtually all recreation use occurs on weekends and holidays and involves vehicle use. The majority of vehicle use occurs on existing ways and roads.

Minerals

The locatable mineral potential of the southern third, or approximately 6,000 acres, of the Roberts WSA is high (see the Roberts Mineral Potential and Mining Claim map in this chapter) for both precious and base metals based on indirect evidence. The structural features, stratigraphic characteristics, gravity data, aeromagnetic data, and the presence of numerous intrusive bodies all are favorable for mineral accumulation. The northern two-thirds of the area, or approximately 9,000 acres, has moderate potential for locatable minerals based upon both abundant direct and sketchy indirect evidence. Barite, a locatable mineral, is rated as having moderate potential for the entire wilderness study area.

The leasable mineral potential for the Roberts wilderness study area is very low for oil, gas, sodium, and potassium; moderate for phosphate; and low for geothermal resources. Oil, gas, sodium and potassium will not be discussed any further in this section due to their low probability of occurrence.

Phosphate-bearing sections are reported to occur in the Vinini formation by Rogers, et. al., 1970. The section of occurrence is reported to be on Vinini Creek immediately east of the study area. The Vinini formation is known to occur within the boundaries of the WSA and this indirect evidence is the basis for the moderate rating.

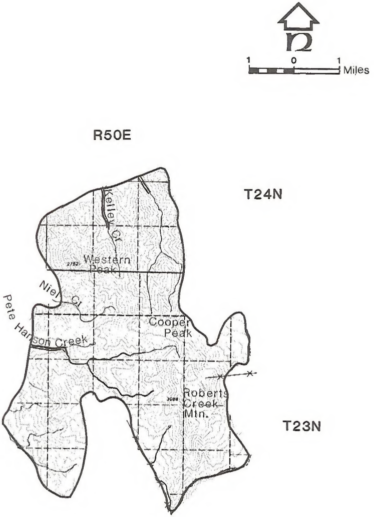
The geothermal potential is classified as low based upon insufficient data.

Wildlife Habitat

The Roberts WSA supports populations of mule deer year round on approximately 15,000 acres of the WSA. The habitat condition is estimated to be fair. Although the deer numbers are generally down based on long-term population trends, they have been increasing in recent years (Hess, 1981). This increase has been attributed to good fawn production, mild winters, and a hunter quota system implemented in 1975 (Tsukamoto, 1979, Hess, 1982).

Sage grouse use most of the Roberts WSA.

There is a fishable stream in the Roberts WSA and about 150 acres of wetland/riparian areas. There are no known threatened or endangered species in the WSA.



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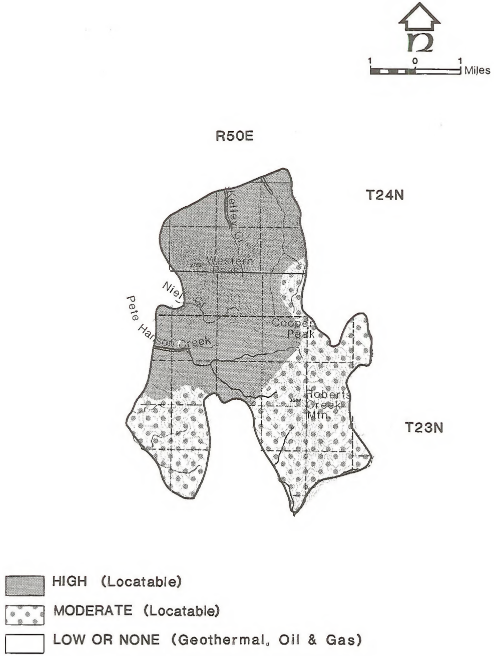
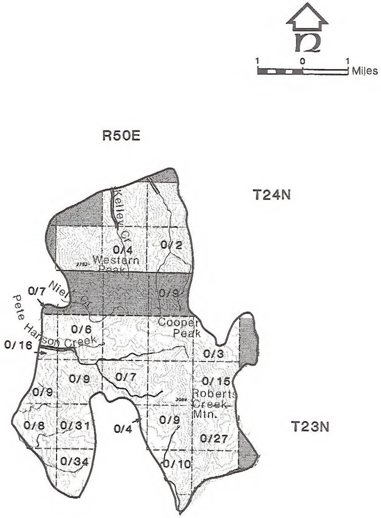
RANGE PROJECTS
NV-060-541 ROBERTS MOUNTAIN



MINERAL AND ENERGY POTENTIAL
NV-060-541 ROBERTS MOUNTAIN



▨ OIL & GAS LEASES

NONE GEOTHERMAL LEASES

Pre/Post FLPMA MINING CLAIMS

MINING CLAIMS AND LEASES
NV-060-541 ROBERTS MOUNTAIN

SIMPSON PARK WSA NV-060-428

The Simpson Park wilderness study area is located in the Simpson Park Mountain Range and contains approximately 49,670 acres of public land (about 1.1 percent of the resource area). It is approximately seventeen miles long and five miles wide. The area is of sufficient size to offer a variety of wildlife habitat, vegetation, and topography.

Wilderness Values

Naturalness: The northern portion of the unit contains a substantial number of human imprints, that negatively affect the wilderness character of the area. The southern portion of the unit is generally free from human imprints and is in a natural state. In the northern portion, disturbances are present in Big Canyon, Moonshine Canyon, and Hiller Canyon. A way extends into Moonshine Canyon approximately one mile, and at one point crosses the slope and connects into a road in the canyon lying directly south of Moonshine Canyon. A road extends into Big Canyon approximately one mile and turns into a way that continues approximately one more mile to a spring development. Approximately one-half mile south of Big Canyon, a way follows the slope to the top of the range.

A way extends into Hiller Canyon approximately a mile and one-half. A spring development is present farther up the canyon. Underwood Canyon has a cherry-stemmed road extending one and one-half miles into the unit. A spring development, located on forty acres of private property, is farther up the canyon. Wood Canyon has a way protuding five-eighths of a mile into the unit. A spring development is farther up the canyon. At the head of Trail Canyon a road circles in and back out of the unit. A way and a fence extend a short distance into the unit on the west side of Ackerman Canyon.

In Salt Marsh Canyon, a way extends north from the private ground approximately one and one-forth miles. Another way is present near the private ground farther into Ackerman Canyon. Cow Canyon has a way extending one mile into the unit. In Grubbs Canyon, a way extends a short distance west from the boundary of the private property.

Shagnasty Basin was identified during the wilderness inventory as unnatural. Numerous ways and old mining scrapes that were not identified during the inventory phase extend west from the boundary of the unnatural area into the unit. One goes approximately one and one-half miles to another forty-acre parcel of private land within the unit. Further along on this way another way extends in one mile and then out of the unit. Another way extends from that way approximately one and one-half miles to Fagin Mountain.

Snow Water Canyon has a way extending from the cherrystemmed road approximately one and one-half miles. Immediately north of Snow Water Canyon another way protrudes one mile into the unit. A way extends from the cherrystemmed road in West Cottonwood Canyon and splits into two separate ways. Another way stems off from here towards Fagin Springs.

At Petunia Springs a way leads to a water development and from there it extends up the mountain approximately two miles and connects into the way extending from Cottonwood Canyon. A cherry-stemmed road extends into the unit approximately one and one-half miles just north of the north fork stream and turns into a way extending a mile and one-half both north and south of Buck Mountain. Numerous fences are present within the unit, mainly on the northern end. (For specific locations of these imprints, see the Simpson Park Range Projects map in this chapter.)

Opportunities for Solitude: Sights and sounds outside the boundary of the Simpson Park wilderness study area would have little effect on the quality of a wilderness experience within the unit. Lack of development and the remoteness of the area are the primary reasons for this. The area is long and narrow with private land protruding into the mountain range at various places. Private land borders the unit at five places: The Gund Ranch in the northeast portion, the Indian Ranch in the southwest portion, two places at the Ackerman Ranch, and at Grubbs Canyon in the southeast portion of the unit.

Opportunities for Primitive and Unconfined Recreation: The diversity of opportunities for hiking, horseback riding, and hunting contribute to an overall outstanding opportunity for recreation.

Special Features: No special features of geological, ecological, scientific, educational, scenic, or historical value are known to exist in the Simpson Park wilderness study area.

Livestock

There are five livestock allotments located within the Simpson Park WSA, 3-Bars, Grass Valley, Underwood, Santa Fe-Ferguson, and Dry Creek. Seven permittees share spring-summer-fall authorized use. Current use is estimated at about 3,600 AUMs within the WSA. In the spring, the cattle generally use the valley bottoms and fans and gradually work to the tops of the mountain ranges where they stay until fall. This pattern of use can vary depending on the availability of water and the weather.

Recreation

The Simpson Park WSA offers abundant opportunities for sustained high-elevation hiking and horseback riding, hunting, sightseeing, photography, and historical and archaeological study. Virtually all recreation use occurs on weekends and holidays and involves vehicle use. The majority of vehicle use occurs on the existing ways and roads.

Minerals

The locatable mineral potential of the Simpson Park WSA is very high. The northern end of the area has known outcrops of barite and excellent potential for additional deposits. The available data provide abundant direct evidence to indicate high favorability for accumulation of mineral resources for approximately 4,500 acres in the northern end of the Simpson Park WSA.

There are presently three mining plans of operation on record for this area. Upon release from wilderness interim management further exploration would occur. Extraction of the identified locatable mineral resources would be expected.

The leasable mineral potential of the Simpson Park Wilderness Study Area is very low for oil, gas, sodium; low for phosphate; and moderate for geothermal resources. Oil, gas, sodium, and potassium will not be discussed any further in this section due to their low probability of occurrence.

Phosphate-bearing sections are reported to occur in the Vinini formation by Rogers, et.al., 1970. No phosphate is specifically reported in the Simpson Park WSA itself, however the Vinini formation does cover a significant portion of the study area. Therefore, the mineral potential for phosphate is rated as low based upon indirect evidence.

Geothermal potential is greatest along the range front fault on the west side of the Simpson Park Range. Walti Hot Springs, four miles north of the WSA, exhibits artesian flow of approximately five hundred gallons per minute with a measured temperature of 73 degrees centigrade (162 degrees farenheit). The geothermal potential is rated as moderate only due to lack of identified thermal springs at the surface.

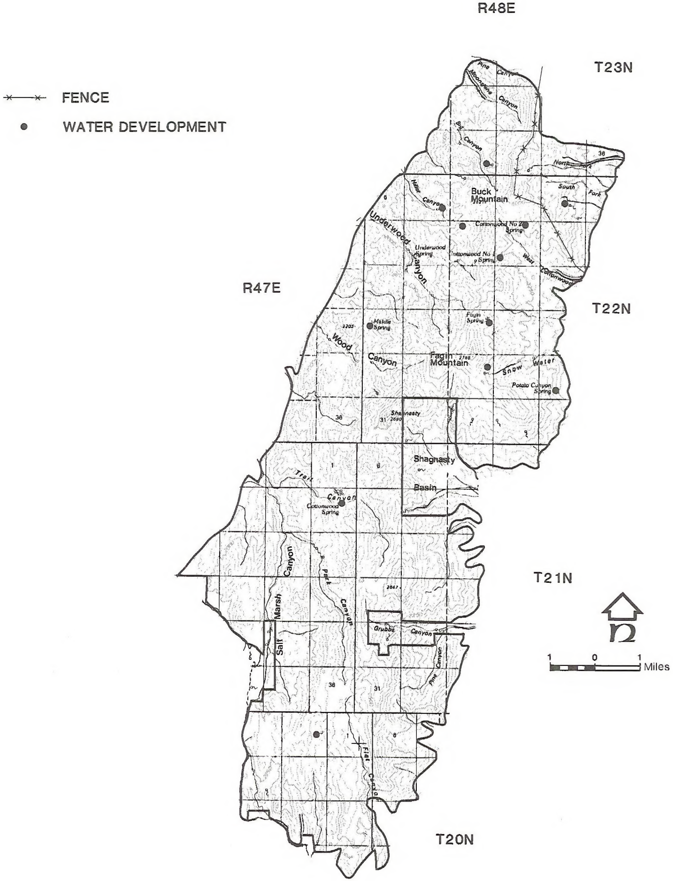
Currently there are 50 post-FLPMA claims within the WSA. There are five post-FLPMA oil and gas leases covering 8,640 acres.

Wildlife Habitat

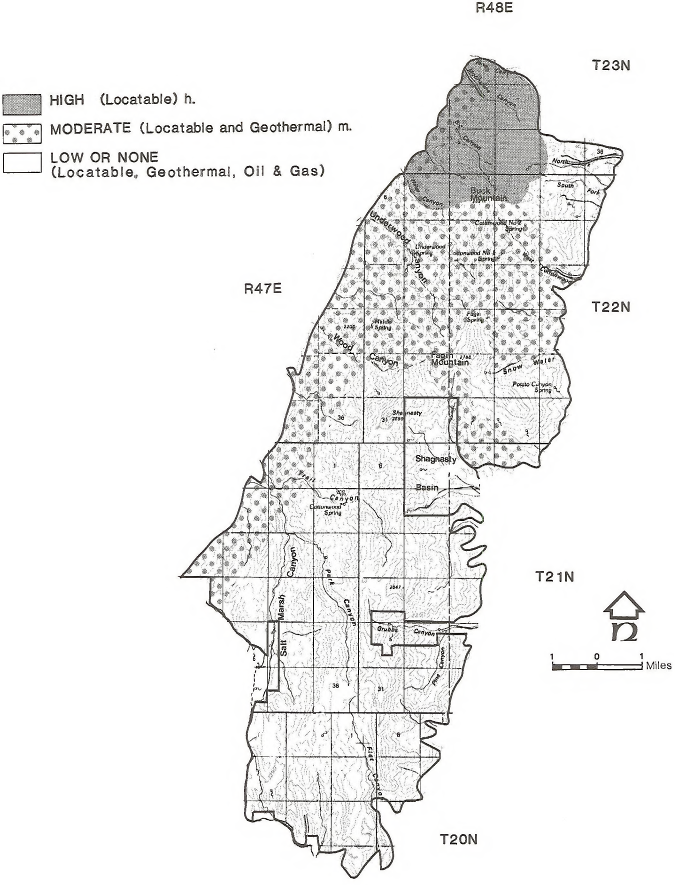
The Simpson Park WSA supports populations of mule deer year round on approximately 47,500 acres of the WSA. The habitat condition is estimated to be fair. Although the deer numbers are generally down based on long-tem population trends, they have been increasing in recent years (Hess, 1981). This increase has been attributed to good fawn production, mild winters, and a hunter quota system implemented in 1975 (Tsukamoto, 1979, Hess, 1982).

Sage grouse use most of the Simpson Park WSA.

There are no fishable streams in the Simpson Park WSA and only 200 acres of wetland/riparian areas. There are no known threatened or endangered species in the WSA.



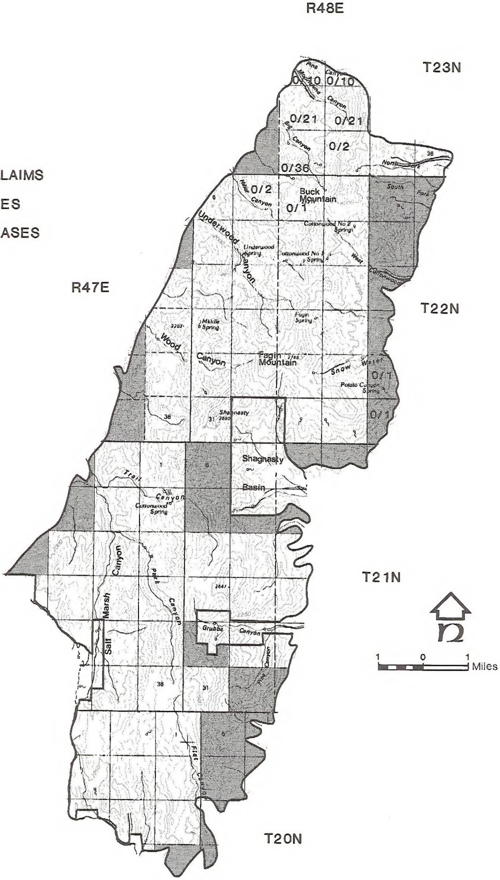
RANGE PROJECTS
NV-060-428 SIMPSON PARK



Pre/Post FLPMA MINING CLAIMS

▨ OIL & GAS LEASES

NONE GEOTHERMAL LEASES



MINING CLAIMS AND LEASES
NV-060-428 SIMPSON PARK

CHAPTER 4

Environmental Consequences

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

ANTELOPE WSA (NV-060-231/241)

Proposed Action (Partial Wilderness)

Under the Proposed Action, 83,100 acres of the Antelope WSA would be recommended suitable for wilderness designation and 4,800 acres would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the protection of wilderness values through wilderness designation and the resulting increases in naturalness and opportunities for solitude and primitive and unconfined recreation.

Impacts on Wilderness Values

All wilderness values on the 83,100 acres recommended suitable for wilderness designation would receive the special legislative protection provided by wilderness designation. The areas of the most spectacular scenery and outstanding opportunities for primitive recreation and naturalness would be retained.

Suitable

Five miles of cherrystem roads would remain open. This is anticipated to allow for continued recreational access to the areas adjacent to the roads. ORV visitor use on the cherrystem roads is anticipated to remain at 220 visitor days annually and would have a negligible impact on naturalness and solitude within the WSA. The 7.5 miles of ways, which would be closed to ORV use, would be allowed to revegetate and would add to the quality of opportunities for primitive and unconfined recreation. Closing the ways to ORV use would not change the amount of use which occurs at present. The projected increase in hunter use is not expected to affect the values of naturalness or solitude, but would contribute to use of the cherrystem roads. The features of the James Wild Horse Trap, pristine spring meadows and secluded remains of Indian wickiups would be protected from possible degradation by ORVs running over meadows and artifacts.

Required maintenance would be provided for the existing four spring developments and for livestock grazing management. Two miles of new fence would be completed in the WSA. This would have a negligible effect on the area's naturalness in the immediate vicinity of the fence because of vegetative disturbance. Within three years of construction, vegetation would become re-established so that the disturbance would be substantially unnoticeable.

Nonsuitable

The 4,800 acres not designated wilderness would remain open for recreational ORV use. Nine miles of way would be open to ORVs and recreational ORV use on this parcel would remain below 100 visits annually for the foreseeable future. This would not impact wilderness values of naturalness and solitude in this area to a significant degree as this use occurs at present.

Oil and gas exploration is not anticipated in the WSA and no impacts to wilderness values would occur.

Development of mineral resources would not affect wilderness values, since no mineral development is expected.

> Conclusion. On the 83,100 acres designated as wilderness, the area's naturalness and opportunities for primitive and unconfined recreation and solitude would be retained. Special features in the suitable portion consisting of the James Wild Horse Trap, pristine spring meadows and Indian relics would be protected. On the 4,800 acres not designated wilderness, there would not be a significant impact to naturalness and opportunities for solitude.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close 83,100 acres of the WSA to recreational ORV use except on five miles of cherrystem roads which would remain open to ORV use. Continued recreational vehicle use of approximately 220 visitor days on the cherrystem roads would be expected annually.

The 4,800 acres of the WSA not designated wilderness would remain open to ORVs. Recreational ORV use levels would increase slightly but remain under 100 visitor days annually for the foreseeable future.

> Conclusion. The 83,100 acres would be closed to recreational ORV use in the designated wilderness, however five miles of cherrystem roads would remain open to recreational ORV use. This would not change the amount of use which occurs at present.
>
> On the 4,800 acres of the WSA not designated wilderness, recreational ORV use would continue to increase slightly, but would not exceed 100 visitor days annually for the foreseeable future.

Adverse Impacts Which Cannot Be Avoided

There are no unavoidable adverse impacts anticipated from this alternative.

Relationship Between Local Short-Term Uses of Man's Environment and Maintenance and Enhancement of Long-Term Productivity

On the 83,100 acres designated wilderness, the wilderness values would be retained.

On the 4,800 acres not designated wilderness, all present uses would continue. Off-road vehicle use would not have a significant effect on wilderness values.

Irreversible and Irretrievable Commitments of Resources

No irreversible or irretrievable commitments of wilderness values is expected under this alternative.

Alternative A (All Wilderness)

Under the All Wilderness Alternative, the entire 87,400 acres of the Antelope WSA would be recommended as suitable for wilderness designation.

The primary impacts under this alternative relate to the protection of wilderness values through wilderness designation and resulting increases in naturalness, opportunities for solitude, and primitive and unconfined recreation through the elimination of ORV use in the WSA.

Impacts on Wilderness Values

Required maintenance would be provided for the existing four spring developments for livestock grazing management. Two miles of fence would be completed in the WSA. This would have a negligible short-term effect on the area's naturalness in the immediate vicinity of the fence because of vegetation disturbance. Within three years of construction, vegetation would become re-established so that the disturbance would be substantially unnoticeable.

Five miles of cherrystem roads would remain open. Sixteen miles of ways would be closed to recreational ORV use. This action would eliminate approximately 100 visitor days of recreational ORV use that are estimated to occur on the ways at present. Elimination of surface disturbance from ORV use would improve the area's naturalness. Additional benefits to naturalness would occur from rehabilitation of ways in the area. The elimination of 100 visitor days of ORV use per year on the ways would also add to the value of solitude by removing the presence of vehicles and limiting frequency of visitors to the area. The continued hunter use is not expected to affect values of naturalness and solitude because motorized vehicles would not be used, although the hunters would likely walk on ways.

Opportunities for primitive recreation, and the supplemental features of outstanding sightseeing in a diverse geologic area would be enhanced on 87,400 acres of the WSA through the rehabilitation of ways. Special features including the James Wild Horse Trap, pristine meadows and Indian Wickiups would be protected from possible degradation by ORVs running through meadows and over artifacts.

Conclusion. On 87,400 acres of the WSA, there would be a slight improvement of the area's naturalness, solitude and opportunities for primitive and unconfined recreation because approximately 100 visitor days would be eliminated. Special features of James Wild Horse Trap, pristine spring meadows and Indian relics would be protected.

Impacts on Recreational Off-road Vehicle Use

Wilderness designation would close the 87,400 acres of the WSA to recreational ORV use. Five miles of cherrystem roads would remain open. Sixteen miles of ways would be closed to recreational ORV use. This action would eliminate about 100 visitor days of ORV use that are estimated to occur on the ways at the present. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational ORV use foregone in the WSA would be absorbed on surrounding public lands.

Conclusion. Recreational ORV use would be foregone on the 87,400 acres designated wilderness and 100 visitor days on the ways would be foregone annually. This shift in use would have a negligible effect on surrounding public lands.

Alternative B (No Wilderness)

Under the No Wilderness Alternative, the 87,400 acres of the Antelope WSA would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to ORV use and the resulting impacts on wilderness values in the foreseeable future.

Impacts on Wilderness Values

Mineral development activity is not anticipated even if the area is not designated as wilderness. Therefore, no impacts to wilderness values from mineral developments would occur.

Sights and sounds from recreational off-road vehicle use would have an adverse impact on solitude. However, this impact is expected to be slight since ORV use is estimated to be less than 220 visitor days annually and is expected to remain below 270 visitor days annually for the foreseeable future. The increase of motorized use by 20% in the WSA would contribute to a loss of the wilderness values of naturalness and opportunities for primitive and unconfined recreation due to loss of rehabilitation of ways within the WSA, the increase of frequency of visitors within the area, and noise from vehicular traffic on roads and ways. The availability of approximately 16 miles of ways would provide hunter access to the WSA, but would detract from the feeling of a primitive and unconfined recreation experience.

Special features such as James Wild Horse Trap, pristine spring meadows and Indian Wickiup remains within the WSA would be more susceptible to degradation due to increased ORV use.

Other recreation uses would remain at levels below 200 visitor days annually for the foreseeable future. This would not significantly impact opportunities for solitude, as no increase in use would occur and existing use is minimal for the area.

Two miles of fence are planned in the WSA and maintenance activities would not change. Grazing facility maintenance and construction actions would not affect wilderness values in the WSA.

> Conclusion. The Antelope WSA's wilderness values of naturalness, solitude and outstanding opportunities for primitive and unconfined recreation would be reduced.
>
> Special features of James Wild Horse Trap, pristine meadows and Indian artifacts would be more susceptible to degradation due to ORV use.

Impacts on Recreational Off-Road Vehicle Use

The WSA would be open to ORV use. Recreational ORV use would increase to 270 visitor days annually (20%) over the foreseeable future.

> Conclusion. There would be an increase in off-road vehicle use within the WSA.

ROBERTS WSA (NV-060-541)

Proposed Action (All Wilderness)

Under the Proposed Action, the entire 15,090 acres of public land in the Roberts WSA would be recommended suitable for wilderness designation.

The primary impacts under this alternative relate to the mineral withdrawal and ORV closure in designated wilderness, the resulting effects on mineral development and recreational ORV use, and the protection of wilderness values.

Impacts on Wilderness Values

Wilderness values of naturalness, opportunities for solitude, and primitive and unconfined recreation, and the supplemental features of diversity of wildlife, vegetation, and topography would be retained in most of the WSA. Wilderness designation would withdraw the WSA from mineral entry.

Two developments of the 198 existing mining claims in the WSA are anticipated to meet the criteria for a valid discovery at the time of designation. In the foreseeable future, wilderness values would be lost as a result of mineral development in the Vinini Creek area. For the purpose of this analysis, it is assumed that in the foreseeable future there would be two discoveries for mineral resources in this WSA: 1) A small open pit precious metals mine on the border of the WSA in the Vinini Creek area. The access would be from outside the WSA. Two miles of road construction is anticipated inside the WSA. About 19 acres total inside the WSA would be disturbed with the mine and tailings; and 2) A small open pit precious metals mine on the border of the WSA in the Vinini Creek area. Access would be from Vinini Creek. About ten acres total inside the WSA would be disturbed including the mine, pit, and one mile of road.

Wilderness designation would close the entire 15,090-acre Roberts WSA to all forms of recreational ORV use. There would be access by motorized vehicles on approximately two miles of cherrystem roads that protrude into the WSA. This action would not eliminate approximately 100 visitor days of recreational ORV use that are estimated to occur in the area at present. However closure of the ways would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation slightly because of elimination of some surface disturbance. The wilderness experience would improve because visitors would not encounter or hear ORV users in the area.

Livestock grazing and range management actions would not affect wilderness values in the WSA because no new range developments are planned in the WSA and maintenance activities would not change.

The areas many special features, the natural arches, the caves, the fishable streams with the waterfall, deep and narrow canyons, rugged peaks and broken ridge and scenic qualities would receive the added protection from tighter retrictions placed on surface disturbing activities within the wilderness areas.

Conclusion. Wilderness values would be slightly enhanced on most of the 15,090 acres of the Roberts WSA. The natural arches, caves, fishable stream and waterfall and other scenic values would be preserved. The wilderness values of naturalness, and solitude would be lost on approximately 29 acres in the areas of mineral development.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire 15,090-acre Roberts WSA to recreational ORV use. Two miles of cherrystem roads would remain open. Recreational ORV use of approximately 100 visitor days would not change.

Conclusion. There would be no impact on recreational off-road vehicle use.

Impacts on Development of Mineral Resources

All lands within the Roberts WSA would be withdrawn from all forms of mineral entry and mineral leasing. Exploration would be eliminated under wilderness designation. This includes high potential for metallic minerals and moderate potential for geothermal resources. Development of oil and gas and geothermal resources is unlikely because of better potential for reserves in other areas. It is assumed that two mines would have production sufficient to support commercial development of the metallic mineral resources. No other development is expected in the WSA.

Conclusion. No impact to development of precious metals resources would occur. Exploration would be foregone on 15,090 acres of the WSA.

Adverse Impacts Which Cannot Be Avoided

There would be no adverse impacts which cannot be avoided.

Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity.

The wilderness values would be protected, except in areas of valid discoveries.

Irreversible and Irretrievable Commitments of Resources

There would be no irreversible and irretrievable commitments of resources.

Alternative B (No Wilderness)

Under this alternative, the entire 15,090 acres of the Roberts WSA would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the development of mineral resources and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

The immediate impact of nondesignation would be important, since a high level of exploration and development activity is anticipated in the first few years if the area is not designated wilderness. It is projected there would be five plans of operation per year for the first few years. Based on past experience, it is expected that each project would have up to two miles of road and eight pads for a total disturbed area of five acres. The total disturbance in the WSA is expected to be about 25 acres per year. The results of the exploration would determine the overall impact on the WSA in the future.

Two developments of the 198 existing mining claims in the WSA are anticipated due to the high potential for precious metals. In the foreseeable future, wilderness values would be lost as a result of mineral development in the Vinini Creek area. For the purpose of this analysis, it is assumed that in the foreseeable future there would be two discoveries for mineral resources in this WSA: 1) A small open pit precious metals mine on the border of the WSA in the Vinini Creek Area. The access would be from outside the WSA. Two miles of road construction is anticipated inside the WSA. About 19 acres inside the WSA would be disturbed with the mine and tailings; and 2) A small open pit precious metals mine on the border of the WSA in the Vinini Creek area. Access would be from Vinini Creek. About ten acres inside the WSA would be disturbed including the mine, pit, and one mile of road.

The mineral development activities would be obvious in the Vinini Creek area. This is the portion of the WSA that is most likely to be used by the public. Therefore, the WSA would no longer appear natural to the average visitor.

Mineral development activities would adversely impact the wilderness value of solitude. Outstanding opportunities for solitude would be lost.

Recreational off-road vehicle use would have an adverse impact on solitude. However, this impact is expected to be slight since ORV use is estimated to be less than 100 visitor days annually and is expected to remain below 130 visitor days annually for the foreseeable future.

Other recreational uses would increase slightly, but would remain at levels below 130 visitor days annually for the foreseeable future. This increase would not significantly impact opportunities for solitude.

No new range developments are planned in the WSA and maintenance activities would not change. Grazing facility maintenance and construction actions would not effect wilderness values in the WSA.

The areas many special features, the natural arches, the caves, the fishable streams with the waterfall, deep and narrow canyons, rugged peaks and broken ridge and scenic qualities would be susceptible to degradation by actions of mineral exploration and development and ORV use.

Conclusion. The Roberts WSA's wilderness values of naturalness and outstanding opportunities for solitude would be lost. The natural arches, caves, fishable stream and waterfall and other scenic values would be susceptible to degradation by actions of mineral exploration and development and ORV use.

Impacts on Recreational Off-Road Vehicle Use

The WSA would be open to ORV use. Three miles of mine access road would be constructed within the WSA making the central portion of the WSA more accessible to ORV use. Recreational ORV use would remain below the 130 visitor days annually over the foreseeable future.

Conclusion. Recreational ORV use would remain below 130 visitor days annually. There would be a slight increase in recreational ORV use.

Impacts on Development of Mineral Resources

All lands within the WSA would remain open for mineral entry and mineral leasing. All mineral resources would be available for development. This includes 6,000 acres of high potential and 9,000 acres of moderate potential for occurrence of metallic minerals.

Development of the metallic minerals is likely because of high quality deposits. Development of oil and gas and geothermal resources is unlikely because of better potential for reserves in other areas.

Because all potential minerals would remain available for development, there would be no impact to development of potential mineral resources.

Conclusion. There would probably be an acceleration of exploration and development of barite and precious metals resources in the Roberts WSA.

SIMPSON PARK WSA (NV-060-428)

Proposed Action (No Wilderness)

Under the proposed action, the entire 49,670 acres of the Simpson Park would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the development of mineral resources and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

The immediate impact of nondesignation would be important, since a high level of exploration and development activity is anticipated in the first few years if the area is not designated wilderness. It is projected there would be five plans of operation per year for the first few years. Based on past experience, it is expected that each project would have up to two miles of road and eight pads for a total disturbed area of five acres. The total disturbance in the WSA is expected to be about 25 acres per year or less than 3,100 acres for the forseeable future. The results of the exploration would determine the overall impact on the WSA in the future.

One development of the 105 existing mining claims in the WSA is anticipated due to the high potential for precious metals. In the foreseeable future, wilderness values would be lost as a result of mineral development in the Shagnasty Basin area. For the purposed of this analysis, it is assumed there would be one discovery for mineral resource in this WSA: 1) A small open pit mine on the border of the WSA in the Shagnasty Basin area. The access would be from outside the WSA. About 19 acres inside the WSA would be disturbed with the mine and tailings.

The mineral development activities would be obvious in all parts of the WSA, therefore, the WSA would no longer appear natural to the average visitor.

Mineral development activities would adversely impact the wilderness value of solitude. Sights and sounds from traffic and construction related to mineral development would lower the quality of solitude in all parts of the WSA. Outstanding opportunities for solitude would be lost.

Recreational off-road vehicle use would have an adverse impact on solitude. However, this impact is expected to be slight since ORV use is estimated to be fewer than 130 visitor days annually and is expected to remain below 160 visitor days annually for the foreseeable future.

Other recreational uses would increase slightly but would remain at levels below 160 visitor days annually for the foreseeable future. This increase would not impact opportunities for solitude.

No new range developments are planned in the WSA and maintenance activities would not change. Grazing facility maintenance and construction actions would not effect wilderness values in the WSA.

Conclusion. The Simpson Park WSA's wilderness values of naturalness, and outstanding opportunities for solitude would be lost due to mineral exploration and development and ORV use.

Impacts on Recreational Off-Road Vehicle Use

The WSA would be open to ORV use. Recreational ORV use would remain below 160 visitor days annually over the foreseeable future.

Conclusion. There would be no impact on recreational ORV use.

Impacts on Development of Mineral Resources

All lands within the WSA would remain open for mineral entry and mineral leasing. All mineral resources would be available for development. This includes 4,500 acres of high potential for occurrence of metallic minerals.

Development of the metallic minerals is likely because of high quality deposits. Development of geothermal resources is unlikely because of the lack of leases, exploration, industry interest, the high costs associated with test wells, and better potential for reserves in other areas.

Because all potential minerals would remain available for development, there would be no impact to development of potential mineral resources.

Conclusion. There would probably be an acceleration of exploration and development of barite and precious metals resources on about 3,100 acres in the Simpson Park WSA.

Adverse Impacts Which Cannot be Avoided

The only unavoidable adverse impacts would be excavations, mine pits, tailing dumps and ponds, roads, and mill sites, associated with mineral exploration and development. Some of these impacts may be reduced by careful examination and mitigating stipulations in approved Notices of Intent and Plans of Operation.

Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity.

If the WSA is not designated wilderness, ORV use and mining exploration and development would reduce wilderness values in the foreseeable future.

Irreversible and Irretrievable Commitments of Resources

Mining exploration and development would create an irreversible commitment of the wilderness resource on about 3,100 acres, if this WSA is not designated as wilderness.

Alternative A (All Wilderness)

Under the All Wilderness Alternative, the entire 49,670 acres of public land in the Simpson Park WSA would be recommended suitable for wilderness designation.

The primary impacts under this alternative relate to the mineral withdrawal and ORV closure in designated wilderness, the resulting effects on mineral development and recreational ORV use, and the protection of wilderness values.

Impacts on Wilderness Values.

Wilderness values of size, naturalness, opportunities for solitude, and primitive and unconfined recreation, and the supplemental features of diversity of wildlife, vegetation, and topography would be retained in most of the WSA. Wilderness designation would withdraw the WSA from mineral entry.

One development of the 105 existing mining claims in the WSA is anticipated due to the high potential for precious metals. In the foreseeable future, wilderness values would be lost as a result of mineral development in the Shagnasty Basin area. For the purpose of this analysis, it is assumed there would be one discovery for mineral resource in this WSA: 1) A small open pit mine on the border of the WSA in the Shagnasty Basin area. The access would be from outside the WSA. About 19 acres inside the WSA would be disturbed with the mine and tailings.

Wilderness designation would close the entire 49,670 acre Simpson Park WSA to all forms of recreational ORV use. This action would eliminate approximately 130 visitor days of recreational ORV use that are estimated to occur in the area at present. This would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation slightly because of elimination of some surface disturbance. The wilderness experience would improve because visitors would not encounter or hear ORV users in the area.

Livestock grazing and range management actions would not affect wilderness values in the WSA because no new range developments are planned in the WSA and maintenance activities would not change.

> Conclusion. Wilderness values would be slightly enhanced on most of the 49,670 acres of the Simpson Park WSA. The wilderness values of naturalness and solitude would be lost on approximately 19 acres in the areas of mineral development.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire 49,670-acre Simpson Park WSA to recreational ORV use. Recreational ORV use of approximately 130 visitor days would be eliminated annually from the WSA. Public land that offers similar or superior opportunities for recreational ORV use is located throughout the region. Therefore, recreational ORV use foregone in the WSA would be absorbed on surrounding public lands.

> Conclusion. Recreational ORV use of 130 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

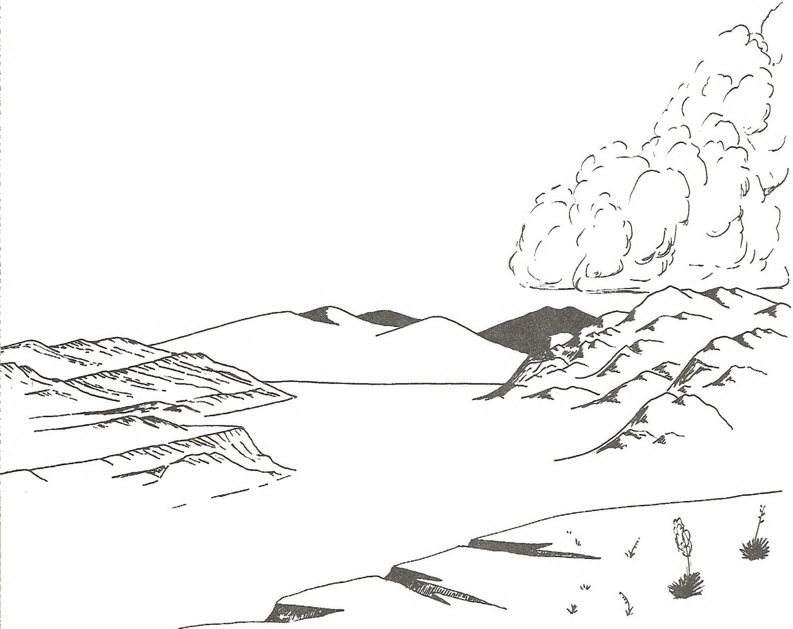
Impacts on Development of Mineral Resources

All lands within the Simpson Park WSA would be withdrawn from all forms of mineral entry and mineral leasing. Exploration would be eliminated under wilderness designation. This includes high potential for metallic minerals and moderate potential for geothermal resources. Development of geothermal resources is unlikely because of the lack of leases, exploration, industry interest, the high costs associated with test wells, and location outside the WSA of a better potential for reserves in other areas. It is assumed that one mine would have production sufficient to support commercial development of the metallic minerals resources. No other development is expected in the WSA.

> Conclusion. No impact to development of precious metals resources would occur. Exploration would be foregone on about 3,100 acres of the WSA.

CHAPTER 5

Consultation and Coordination



CHAPTER 5

CONSULTATION AND COORDINATION

PUBLIC INVOLVEMENT

Consultation and coordination requirements for the wilderness elements on the Shoshone-Eureka Resource Management Plan/Environmental Impact Statement were met as part of the overall planning effort.

A notice of intent to commence land use planning for the Shoshone-Eureka Resource Area was published in the Federal Register in March of 1981. During April of 1981, a news release announced the beginning of the issue identification phase of the resource management plan. It explained the purpose of the plan and the manner in which the public could participate in the planning process. Four open houses provided the public with an opportunity to discuss the planning process and identify issues and were held May 4 in Battle Mountain, May 5 in Austin, May 6 in Eureka, and May 7 in Reno.

The Battle Mountain District Advisory Council (a 10-member group of citizens representing such interests as ranching, wildlife, mining, elected government, environmental preservation, and the public at large) was briefed about the process at its October 1980 meeting.

In April 1981, Bureau personnel met with local Indian tribes and with the commissioners of Eureka, Lander, and Nye counties. These individuals were informed about the planning process and asked to identify their concerns.

SCOPING PROCESS

A newsletter explaining the scope and purpose of the Shoshone-Eureka Resource Management Plan was issued during the first half of 1981, and mailed to approximately 200 individuals, organizations and agencies. A 45-day formal comment period regarding the potential issues began April 20, 1981 and ended June 5, 1981.

During the scoping process, the following issues regarding environmental impacts of wilderness preservation or non-preservation were raised by the public:

1. Withdrawal of lands with mineral potential from exploration and development by the minerals industry.
2. Loss of wilderness values due to resource use and development in wilderness study areas.
3. Increased costs of livestock operation due to restrictions on motor vehicle use.

A letter explaining the results of issue identification was sent to individuals and organizations on the mailing list in December of 1981. It included a discussion of planning criteria and invited the public to review the draft criteria.

A notice of intent to develop alternatives for the resource management plan was published in the Federal Register in November, 1982. An informational letter describing the draft alternatives was mailed to over 250 individuals, organizations, and agencies. A public comment period was held from December 1, 1982 to January 10, 1983. Open houses were held in Battle Mountain, Eureka, and Reno in December. • Twenty-five comment letters were received during the comment period resulting in several changes to the proposed alternatives.

PUBLIC REVIEW AND HEARINGS

The draft resource management plan/environmental impact statement was filed with the Environmental Protection Agency and made available to the public on June 15, 1983. A BLM notice announcing the availability of the draft resource management plan/environmental impact statement was published in the June 24, 1983 issue of the Federal Register. This notice announced that the review period was to end on September 21, 1983, and included notification of public hearings to be held in Battle Mountain, Eureka, and Reno, Nevada. News releases were issued form the Nevada State Office to local and regional news media. After the draft document was filed with the Environmental Protection Agency, over 350 copies were distributed to the following reviewing agencies, elected officials, and interested publics. An asterisk indicates those who commented on the wilderness aspect of the document.

CONGRESSIONAL

Senator Chic Hecht
Senator Paul Laxalt
Congressman Harry Reid
Congresswoman Barbara Vucanovich

FEDERAL AGENCIES

- Advisory Council on Historic Preservation
- Department of Agriculture
  - Forest Service
  - Soil Conservation Service
- Department of Defense
  - Department of the Air Force
- Department of Energy
- Department of the Interior
  - Bureau of Indian Affairs
  - Bureau of Mines
  - Bureau of Reclamation*
  - Fish and Wildlife Service
  - Geological Survey
  - Park Service
- Environmental Protection Agency

STATE AGENCIES

Office of the Governor, Nevada
Nevada State Clearinghouse--15 copies for distribution to State Agencies*
Legislative Counsel Bureau

LOCAL AGENCIES

Eureka County Commissioners
Lander County Commissioners
Nye County Planner

UNIVERSITY OF NEVADA

Max C. Fleischmann College of Agriculture Cooperative Extension Service
Division of Agricultural and Resource Economics
Division of Animal Science
Division of Renewable Natural Resources
Desert Research Institute, Las Vegas and Reno
Mackay School of Mines
Nevada Bureau of Mines and Geology

NEVADA STATE LEGISLATORS

Richard E. Blakemore
Norman Glasser
John Marvel
Kenneth K. Redelsperger

OTHERS

American Horse Protection Association, Inc.
Audubon Society, Lahontan Chapter Camp Fire Club of America
Center for Action on Endangered Species, Inc.
Desert Fishes Council
Desert Protective Council, Inc.
Environmental Action, Inc.
Forests Institute
Grazing permit holders within the Shoshone-Eureka Resource Area*
International Society for the Protection of Mustangs and Burros
National Council of Public Land Users, Colorado
National Rifle Association of America
National Trappers Association, Inc.
National Wildlife Federation
Nation-Wide Forest Planning Clearinghouse
Natural Resources Defense Council, Inc.
Nature Conservancy
Nevada Cattlemen's Association
Nevada Outdoor Recreation Association/National Public Lands Task Force*
Nevada Wildlife Federation
North American Falconers Association
Northern Nevada Native Plan Society

Pacific Legal Foundation
Private citizens who have participated in the planning process*
Private citizens who have requested a copy of the plan
Public Lands Council
Sierra Club*
Society of American Foresters
Society for Range Management
Wilderness Society
Wild Horse Organized Assistance
Wildlife Management Institute*
Wildlife Society, Nevada Chapter

Three public hearings were held during the public review period on the draft resource management plan/environmental impact statement. A total of eleven people spoke on the wilderness issue at the public hearings: None at the hearing in Battle Mountain on July 26, 1983; one at the hearing in Eureka on July 27, 1983; and ten at the hearing in Reno on July 28, 1983.

Transcripts of the public hearings are available for inspection at the following BLM offices: Battle Mountain District Office, North 2nd and Scott Streets, Battle Mountain, Nevada; Nevada State Office, Room 300, Federal Building, 300 Booth Street, Reno, Nevada; and the Office of Public Affairs, 18th and C Streets, Washington, D.C.

A total of 11 written comments pertaining to the wilderness issue were received during the public review period on the draft environmental impact statement. In addition 11 persons spoke regarding the wilderness issue at the 3 public hearings.

All letters and testimony were reviewed to determine if they met the required criteria for response, i.e., discussion of the adequacy of the draft environmental impact statement. Substantive comments which presented new data, questioned facts and/or analyses, or commented on issues bearing directly on the draft environmental impact statement or the environmental impacts of the alternatives were fully evaluated and given responses. Changes or additions to the draft environmental impact statement have been incorporated into this final statement.

The responses to the written and oral comments received on the draft environmental impact statement are displayed in Table 6-1.

INDEX TO COMMENT LETTERS

All of the letters received during the public comment period which addressed the wilderness issue have been reprinted in this final environmental impact statement. Many of these letters also contained comments pertaining to the resource management plan in general. These comments are addressed and analyzed in the Shoshone-Eureka Resource Management Plan/Final Environmental Impact Statement. In addition, excerpts from the public hearings record which required responses have also been reprinted. The numbers which appear next to the individual's name correspond to the number assigned to the reprinted public comment. An asterisk next to a person's name indicates that both written and oral testimony was submitted. Responses were developed for the letters only, unless issues not covered in the letter were raised during oral testimony.

1. Lander County Commissioners, Warren Storie, Chairman
2. Charles M. Bagley
3. Reed Secord
4. Nevada Outdoor Recreation Association, Charles S. Watson, Director*
5. U.S. Department of Interior, Bureau of Reclamation, James L. Andrews, Regional Director
6. Harry Melts
7. Homestake Mining, Alan D. Cox, Regional Manager - Environmental Affairs
8. Sierra Club, Toiyabe Chapter, Marjorie Sill, Conservation Chair*
9. Wildlife Management Institute, Daniel A. Poole, President
10. Richard McKay
11. Sierra Club, Toiyabe Chapter, Rose Strickland, Chair, Public Lands Committee
12. Bill Card
13. Nevada Mining Association, Bob Warren, Executive Secretary
14. Barbara Kelly
15. Dave Hornbeck
16. Amy Mazza

17. Sierra Club, Toiyabe Chapter, Chair, Public Lands Committee

18. Atlantic Richfield Company, J.R. Mitchell, Public Lands Coordinator+

19. Minerals Exploration Coalition, John D. Wells, President+

20. United States Environmental Protection Agency, Charles W. Murray, Jr., Assistant Regional Administrator

+ Received after public comment period but analyzed in PFEIS.

Table 6-1 Responses to Written and Oral Comments

Number	Response
1.	Recommending the southern portion of the Simpson Park Wilderness Study Area as suitable for wilderness designation was considered during the study process. However because the area lacks outstanding wilderness values on its own, it did not seem feasible to recommend the area for wilderness designation. Criterion Number 2 of the Wilderness Study Policy states that "the area must be capable of being effectively managed to preserve its wilderness character." Private inholdings which the owner is reluctant to dispose of, private land with potential for development on the periphery of the unit, numerous roads and ways, and a boundary located on the 7,000 foot contour line would have the cumulative effect of making the South Simpson Park area undesireable as wilderness in the long term.
2.	The term "human imprints" has been added to the glossary. See page G-2.
3.	The southern most boundary of the Antelope unit currently does follow a very rugged jeep trail. The trail immediately north of the boundary, the one referred to, is noticeable but hardly passable. Designating this trail as the southern boundary would not improve the WSA.
4.	Using this southern way as a boundary line was considered in earlier analysis but it was felt that reducing the size of the area more than it is now would reduce the wilderness characteristics of the study area. The area between the way and the fence is very rugged. A boundary line between these two points would be difficult to describe and recognize on the ground.
5.	The BLM Wilderness Management Policy provides for continued use of a valid existing right. The policy also identifies the specific guidelines which will be used in developing a Wilderness Management Plan for each BLM-administered wilderness area. These detailed plans will include decisions to allow or disallow motor vehicle use and activities in accordance with the policy.
6.	Since one of the purposes of a wilderness area is to provide opportunities for a "primitive and unconfined type of recreation", there are no provisions for providing services to people who use these areas other than what might be available through local agencies and organizations such as the county sheriff or search and rescue teams. If the Antelope Wilderness Study Area is designated wilderness, a wilderness management plan will be written for the area. The need for provisions to take care of people using the area will be considered and addressed in that plan.

7. There are no provisions for keeping the roads in the area open during any season.

8. Livestock grazing is a valid existing use in the Antelope Wilderness Study Area that would continue in the same manner and degree should the area become wilderness. The BLM Wilderness Management Policy states that in connection with the livestock operation "where practical alternatives do not exist, maintenance or other activities may be accomplished through the occasional use of motorized equipment." In addition the policy also directs that "allotment management plans for allotments partially or entirely within designated wilderness will specifically identify the following:

   a. The use of motor vehicles, motorized equipment or other forms of mechanical equipment including: Specific equipment, where it is to be used, and what it is to be used for."

9. Each area identified during the wilderness inventory as a wilderness study area possesses the wilderness characteristics of size, naturalness, and outstanding opportunities for solitude or primitive and unconfined recreation. Wilderness study area status was not determined on the basis of being a roadless area alone.

10. Currently there is very little exploration and no development within the wilderness study areas. Since the local areas are not currently dependent upon any mining activity within the study area, no significant economic or social impacts are foreseen.

11. The determinations of access routes being either roads or ways during the wilderness inventory process were based on the Wilderness Inventory Handbook, published September 27, 1978. Page 5 of that document states "the word roadless refers to the absence of roads which have been improved and maintained by mechanical means to ensure relatively regular and continuous use. A way maintained solely be the passage of vehicles does not constitute a road." The Interior Board of Land Appeals (IBLA) has not reversed this decision. Additionally, the IBLA has ruled the use of cherrystem roads by the BLM as an acceptable practice in delineating WSA boundaries and that the use of cherrystemming is consistent with the Wilderness Act of 1964.

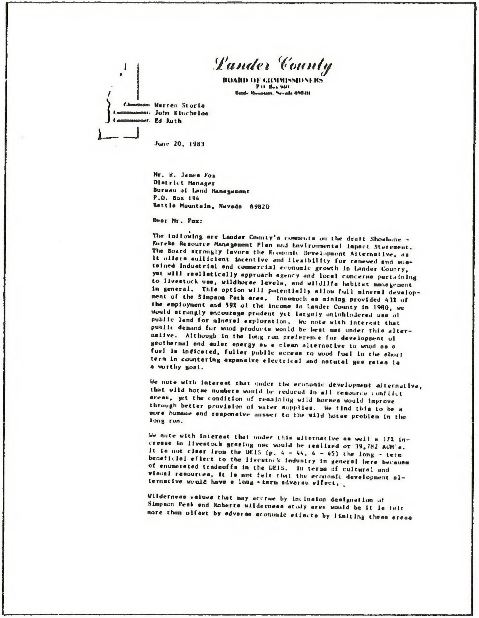
12. The economic analysis was based on the most current information available at the time. There are no data in the updated information that would significantly change the original analysis.

13. Mineral potential is only one of six quality standards that are considered when analyzing the areas potential for wilderness. Along with the six quality standards, there are also two criteria that must also be considered (see p. 1-2).

14. The narrow portions of the Simpson Park Wilderness Study Area have private land protruding into the boundary which would cause manageability problems. This is not the case, however, in the narrow portions of the Roberts Wilderness Study Area.

15. Water quality will be maintained or improved in accordance with State and Federal standards on existing or projected land-use plans as a matter of BLM policy. Management actions on public land within watersheds will be designed to protect water quality. It is not anticipated that designation or nondesignation of wilderness would affect these actions to any appreciable degree and therefore would not significantly alter water quality within the WSA.

Comment Letter 1



Lander County
BOARD OF COMMISSIONERS
P.O. Box 941
Battle Mountain, Nevada 89820

Chairman: Warren Storie
Commissioner: John Kincheloe
Commissioner: Ed Ruth

June 20, 1983

Mr. R. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, Nevada 89820

Dear Mr. Fox:

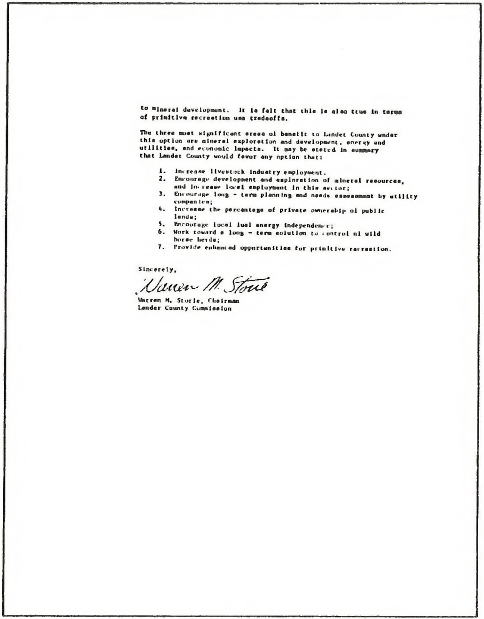
The following are Lander County's comments on the draft Shoshone - Eureka Resource Management Plan and Environmental Impact Statement. The Board strongly favors the Economic Development Alternative, as it offers sufficient incentive and flexibility for renewed and sustained industrial and commercial economic growth in Lander County, yet will realistically approach agency and local concerns pertaining to livestock use, wildhorse levels, and wildlife habitat management in general. This option will potentially allow full mineral development of the Simpson Park area. Inasmuch as mining provided 43% of the employment and 59% of the income in Lander County in 1980, we would strongly encourage prudent yet largely uninhindered use of public land for mineral exploration. We note with interest that public demand for wood products would be best met under this alternative. Although in the long run preference for development of geothermal and solar energy as a clean alternative to wood as a fuel is indicated, fuller public access to wood fuel in the short term in countering expensive electrical and natural gas rates is a worthy goal.

We note with interest that under the economic development alternative, that wild horse numbers would be reduced in all resource conflict areas, yet the condition of remaining wild horses would improve through better provision of water supplies. We find this to be a more humane and responsive answer to the wild horse problem in the long run.

We note with interest that under this alternative as well a 17% increase in livestock grazing use would be realized or 39,782 AUM's. It is not clear from the DEIS (p. 4 - 44, 4 - 45) the long - term beneficial effect to the livestock industry in general here because of enumerated tradeoffs in the DEIS. In terms of cultural and visual resources, it is not felt that the economic development alternative would have a long - term adverse effect.

Wilderness values that may accrue by inclusion designation of Simpson Peak and Roberts wilderness study area would be it is felt more than offset by adverse economic effects by limiting these areas

Comment Letter 1



to mineral development. It is felt that this is also true in terms of primitive recreation use tradeoffs.

The three most significant areas of benefit to Lander County under this option are mineral exploration and development, energy and utilities, and economic impacts. It may be stated in summary that Lander County would favor any option that:

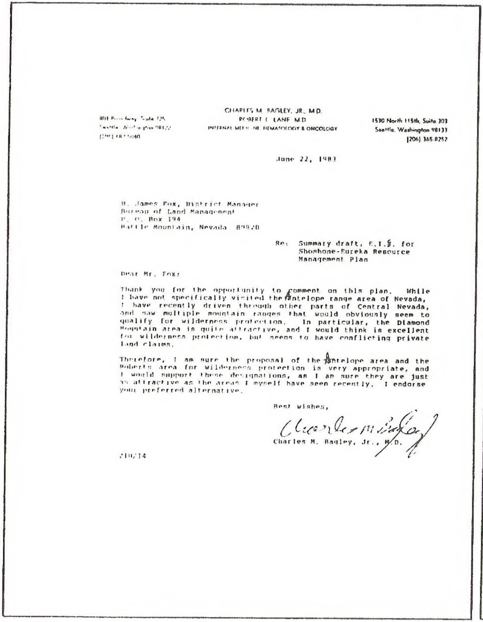
1. Increase livestock industry employment.
2. Encourage development and exploration of mineral resources, and increase local employment in this sector;
3. Encourage long - term planning and needs assessment by utility companies;
4. Increase the percentage of private ownership of public lands;
5. Encourage local fuel energy independence;
6. Work toward a long - term solution to control of wild horse herds;
7. Provide enhanced opportunities for primitive recreation.

Sincerely,

Warren M. Storie

Warren M. Storie, Chairman
Lander County Commission

Comment Letter 2



801 Broadway, Suite [illegible]
Seattle, Washington [illegible]
[illegible]

CHARLES M. BAGLEY, JR., M.D.
ROBERT E. LANE, M.D.
INTERNAL MEDICINE, HEMATOLOGY & ONCOLOGY

1530 North 115th, Suite 303
Seattle, Washington 98133
(206) 365-8252

June 22, 1983

H. James Fox, District Manager
Bureau of Land Management
P. O. Box 194
Battle Mountain, Nevada 89820

Re: Summary draft, E.I.S. for
Shoshone-Eureka Resource
Management Plan

Dear Mr. Fox:

Thank you for the opportunity to comment on this plan. While I have not specifically visited the Antelope range area of Nevada, I have recently driven through other parts of Central Nevada, and saw multiple mountain ranges that would obviously seem to qualify for wilderness protection. In particular, the Diamond Mountain area is quite attractive, and I would think is excellent for wilderness protection, but seems to have conflicting private land claims.

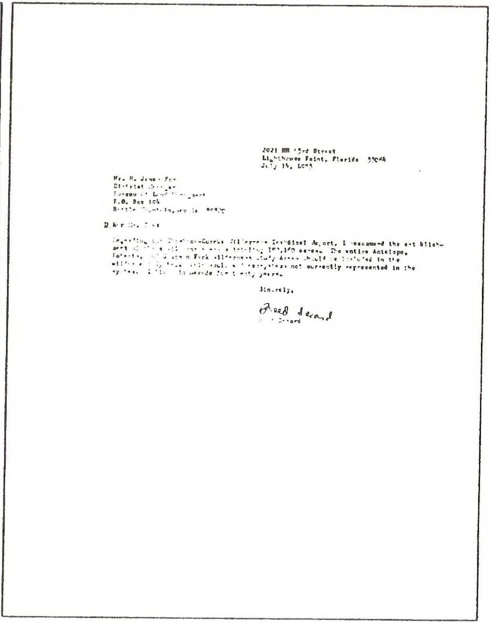
Therefore, I am sure the proposal of the Antelope area and the Roberts area for wilderness protection is very appropriate, and I would support these designations, as I am sure they are just as attractive as the areas I myself have seen recently. I endorse your preferred alternative.

Best wishes,

Charles M. Bagley, Jr., M.D.

210/14

Comment Letter 3



2021 NE [illegible]rd Street
Lighthouse Point, Florida 33064
July 14, 1983

Mr. H. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, Nevada 89820

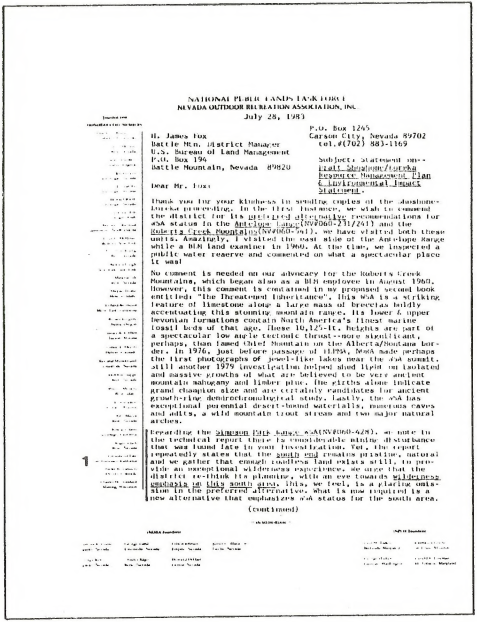
Dear Mr. Fox:

Regarding the Shoshone-Eureka Wilderness Technical Report, I recommend the establishment of [illegible] wilderness areas totaling [illegible],160 acres. The entire Antelope, Roberts, and Simpson Park Wilderness Study Areas should be included in the wilderness system. [illegible] ecosystems not currently represented in the system. I [illegible] in Nevada for twenty years.

Sincerely,

Fred Secord
[illegible] Secord

Comment Letter 4



NATIONAL PUBLIC LANDS TASK FORCE
NEVADA OUTDOOR RECREATION ASSOCIATION, INC.

July 28, 1983

P.O. Box 1245
Carson City, Nevada 89702
tel.#(702) 883-1169

H. James Fox
Battle Mtn. District Manager
U.S. Bureau of Land Management
P.O. Box 194
Battle Mountain, Nevada 89820

Subject: Statement on--
Draft Shoshone/Eureka
Resource Management Plan
& Environmental Impact
Statement.

Dear Mr. Fox:

Thank you for your kindness in sending copies of the Shoshone-Eureka proceeding. In the first instance, we wish to commend the district for its preferred alternative recommendations for WSA status in the Antelope Range(NV#060-231/241) and the Roberts Creek Mountains(NV#060-541). We have visited both these units. Amazingly, I visited the east side of the Antelope Range while a BLM land examiner in 1960. At the time, we inspected a public water reserve and commented on what a spectacular place it was!

No comment is needed on our advocacy for the Roberts Creek Mountains, which began also as a BLM employee in August 1960. However, this comment is contained in my proposed second book entitled: "The Threatened Inheritance". This WSA is a striking feature of limestone along a large mass of breccias boldly accentuating this stunning mountain range. Its lower & upper Devonian formations contain North America's finest marine fossil beds of that age. These 10,125-ft. heights are part of a spectacular low angle tectonic thrust--more significant, perhaps, than famed Chief Mountain on the Alberta/Montana border. In 1976, just before passage of FLPMA, NORA made perhaps the first photographs of jewel-like lakes near the WSA summit. Still another 1979 investigation helped shed light on isolated and massive growths of what are believed to be very ancient mountain mahogany and limber pine. The girths alone indicate grand champion size and are certainly candidates for ancient growth-ring dendrochronological study. Lastly, the WSA has exceptional perennial desert-bound waterfalls, numerous caves and adits, a wild mountain trout stream and two major natural arches.

1 Regarding the Simpson Park Range WSA(NV#060-428), we note in the technical report there is considerable mining disturbance that was found late in your investigation. Yet, the report repeatedly states that the south end remains pristine, natural and we gather that enough roadless land exists still, to provide an exceptional wilderness experience. We urge that the district re-think its planning, with an eye towards wilderness emphasis on this south area. This, we feel, is a glaring omission in the preferred alternative. What is now required is a new alternative that emphasizes WSA status for the south area.

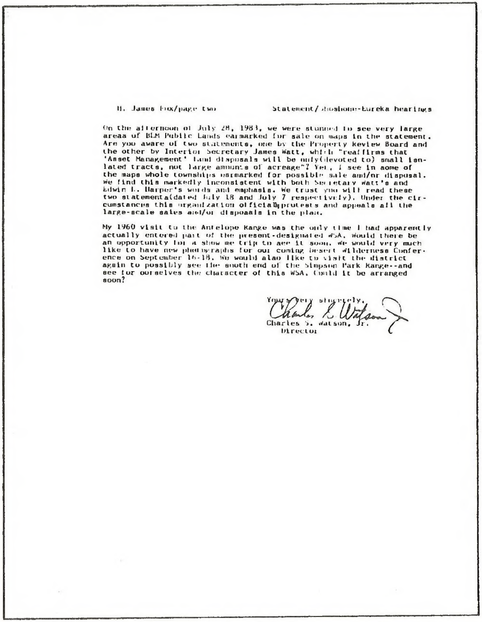
(continued)

IN MEMORIAM

(NORA founders)

(NPLTF founders)

Comment Letter 4

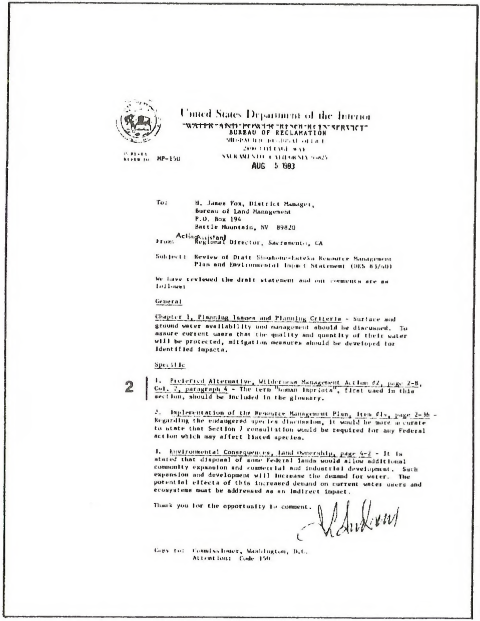


On the afternoon of July 28, 1983, we were stunned to see very large areas of BLM Public Lands earmarked for sale on maps in the statement. Are you aware of two statements, one by the Property Review Board and the other by Interior Secretary James Watt, which "reaffirms that 'Asset Management' land disposals will be only(devoted to) small isolated tracts, not large amounts of acreage"? Yet, I see in some of the maps whole townships earmarked for possible sale and/or disposal. We find this markedly inconsistent with both Secretary Watt's and Edwin L. Harper's words and emphasis. We trust you will read these two statements(dated July 18 and July 7 respectively). Under the circumstances this organization officially protests and appeals all the large-scale sales and/or disposals in the plan.

My 1960 visit to the Antelope Range was the only time I had apparently actually entered part of the present-designated WSA. Would there be an opportunity for a show me trip to see it soon. We would very much like to have new photographs for our coming Desert Wilderness Conference on September 16-18. We would also like to visit the district again to possibly see the south end of the Simpson Park Range--and see for ourselves the character of this WSA. Could it be arranged soon?

Yours very sincerely,
Charles S. Watson Jr.
Charles S. Watson, Jr.
Director

Comment Letter 5



United States Department of the Interior
~~WATER AND POWER RESOURCES SERVICE~~
BUREAU OF RECLAMATION
MID-PACIFIC REGIONAL OFFICE
2800 COTTAGE WAY
SACRAMENTO, CALIFORNIA 95825

IN REPLY REFER TO: MP-150

AUG 5 1983

To: H. James Fox, District Manager,
Bureau of Land Management
P.O. Box 194
Battle Mountain, NV 89820

From: Acting Assistant Regional Director, Sacramento, CA

Subject: Review of Draft Shoshone-Eureka Resource Management Plan and Environmental Impact Statement (DES 83/60)

We have reviewed the draft statement and our comments are as follows:

General

Chapter 1, Planning Issues and Planning Criteria - Surface and ground water availability and management should be discussed. To assure current users that the quality and quantity of their water will be protected, mitigation measures should be developed for identified impacts.

Specific

2 1. Preferred Alternative, Wilderness Management Action #2, page 2-8, Col. 2, paragraph 4 - The term "human imprints", first used in this section, should be included in the glossary.

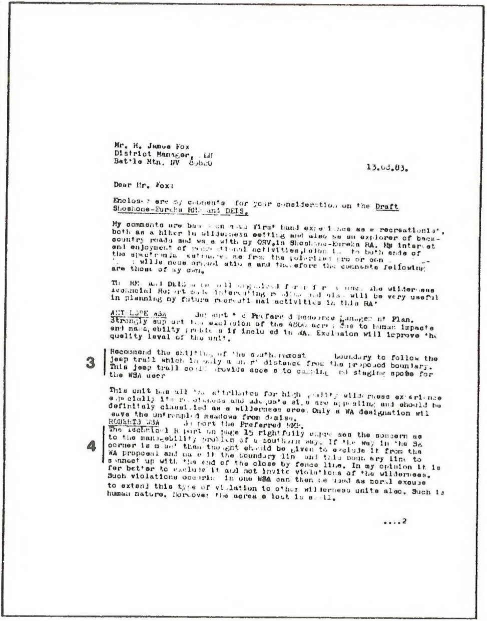
2. Implementation of the Resource Management Plan, Item #15, page 2-36 - Regarding the endangered species discussion, it would be more accurate to state that Section 7 consultation would be required for any Federal action which may affect listed species.

3. Environmental Consequences, Land Ownership, page 4-2 - It is stated that disposal of some Federal lands would allow additional community expansion and commercial and industrial development. Such expansion and development will increase the demand for water. The potential effects of this increased demand on current water users and ecosystems must be addressed as an indirect impact.

Thank you for the opportunity to comment.

Copy to: Commissioner, Washington, D.C.
Attention: Code 150

Comment Letter 6



Mr. H. James Fox
District Manager, BLM
Bat'le Mtn. NV 89820

13.08.83.

Dear Mr. Fox:

Enclosed are my comments for your consideration on the Draft Shoshone-Eureka RMP and DEIS.

My comments are based on some first hand experience as a recreationist, both as a hiker in wilderness setting and also as an explorer of back-country roads and ways with my ORV, in Shoshone-Eureka RA. My interest and enjoyment of recreational activities, belonging to both ends of the spectrum, estranges me from the polarized pro or con [illegible] wilderness organizations and therefore the comments following are those of my own.

The RMP and DEIS are well organized for easy reference. The Wilderness Technical Report made interesting reading and also will be very useful in planning my future recreational activities in this RA.

ANTELOPE WSA Support the Preferred Resource Management Plan. Strongly support the exclusion of the 4800 acres due to human impacts and manageability problems if included in WA. Exclusion will improve the quality level of the unit.

3 Recommend the shifting of the southernmost boundary to follow the jeep trail which is only a short distance from the proposed boundary. This jeep trail could provide access to camping and staging spots for the WSA user.

This unit has all the attributes for high quality wilderness experience especially its remoteness and adequate size are appealing and should be definitely classified as a wilderness area. Only a WA designation will save the untrampled meadows from demise.
ROBERTS WSA Support the Preferred RMP.
4 The Technical Report on page 15 rightfully expresses the concern as to the manageability problem of a southern way. If the way in the SE corner is used then thought should be given to exclude it from the WA proposal and make it the boundary line and this boundary line to connect up with the end of the close by fence line. In my opinion it is far better to exclude it and not invite violations of the wilderness. Such violations occurring in one WSA can then be used as moral excuse to extend this type of violation to other wilderness units also. Such is human nature. Moreover the acreage lost is small.

....2

5 Mention is made on p.17 that primitive ways inside the wilderness areas will be left open for vehicular use, related to a valid existing right. What that is going to mean in real life is all the friends of that right holder and all his acquaintances who prefer vehicular access for hunting and/or shorten their horse or foot trips into wilderness area will have keys to the locked gate.
A road/way which is used on a non/emergency basis could not be classified as wilderness. Most tasks can be done using horses.
As an example in Arizona a powerline built long ago and is now in a WSA has been maintained by horse transport. Either close a road/way to all or exclude it from wilderness designation and leave it open to all.

This WSA is very scenic and has outstanding supplemental ecologic values of high interest which attracts visitors from far afield already and once established as WA many more will come. It contains many types of features of interest for such a small area. All this makes it a natural for a protected wilderness status.

Its size is fairly small making day use the common type of use. Number of visitors to an area is a function of information available; once established as a wilderness area (WA) and printed information will be distributed (it is only a matter of short time until someone is going to publish a detailed guidebook to all BLM wilderness areas) therefore a substantial increase to this area is going to occur.
The visitors will be camping at their vehicular transport at or near the perimeter of the WSA. Was this taken in account in drawing the present boundaries? I saw no evidence of this in the RMP or WTR!
Perhaps some of the ways or part of these could be excluded from wilderness designation for such use or in some locations withdrawal of surrounding lands must be made. In any case this type of use must be given consideration before the wilderness boundaries are finalized.

Simpson Park WSA Support non-wilderness status (Preferred RMP)
I was not impressed with this area as wilderness, specially not with the northern half and [illegible]. Too many human imprints The many disturbances of the past have been allowed to happen with no restrictive controls from the BLM. To declare these parts as wilderness is lowering the standards. Compared to Roberts WSA the unit is not very scenic, no outstanding special scenic or geologic features were evident.

The southern half is in a more natural state but constricted by the two private holdings. If a WA should be established for the southern part a right-a-way through these private lands need to be obtained.

....3

Another reason for non-wilderness recommendation is that the area is not manageable to strictly enforce protective regulations.
To add wilderness areas which can not effectivel protected will be setting a damaging example affecting adversely other WA units.
The RMP on p.3-[illegible] concedes to the difficulty to the closure of ways and controlling of motorized entry.

OTHER RESOURCE ISSUES.

GRAZING. Support the Resource Protective Alternative.

The short term downward adjustments and providing rest periods from grazing during critical growth periods will bring about the needed improvement of the soil, vegetation and watershed resources.
Eventually the livestock owner too is to reap the benefits.
That short term reduction in grazing bringing long term benefits is resisted by ranchers and not more vigorously pursued by BLM in their action decisions is a definite weakness and deficiency in reasoning in all parties concerned. A destruction of a resource in name of tradition?

ACCESS

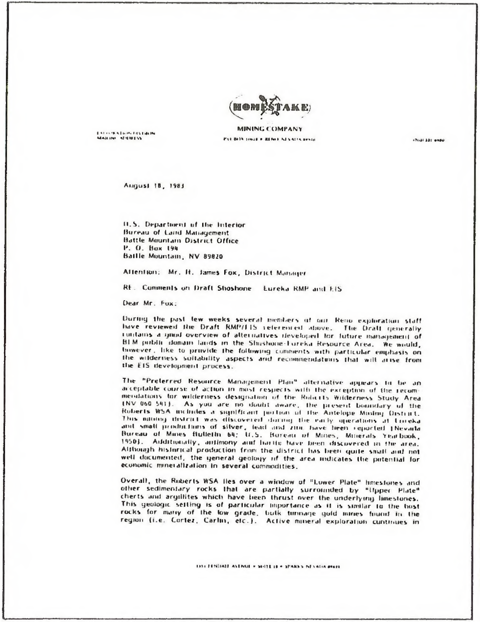
No mention is made in Shoshone-Eureka RMP/EIS as to the status of legal access for routes and roads which would enhance the management and visitor access to wilderness and recreation areas. This subject is discussed and evaluated in other BLM districts RMP/EIS (Wells RA for an example). In your report the whole issue is ignored.
Hopefully an evaluation and action plan for legal access where such would be beneficial to the management and to the public will be made in your Final Environmental Impact Statement draft.
Where lack of rights of way hinders the ready access by the public to areas with recreational resources, proceedings should be started to obtain the needed access easements. Lack of easement through private land can eliminate a recreational resource.
Geothermal RESOURCE AND RECREATIONAL RESOURCE

This resource was evaluated only in terms of industrial-commercial utilization. No mention in your RMP/EIS was made of the many hot springs in your RA under discussion. Other BLM districts have evaluated this valuable recreational resource in their RMP-s. The Draft Final EIS should remedy this omission.

Sincerely, Harry Malts

Harry Malts
Box [illegible]
Creston, B.C. V0B G0
Canada

Comment Letter 7



HOMESTAKE
MINING COMPANY

EXPLORATION DIVISION
MAILING ADDRESS
P.O. BOX [illegible] • RENO NEVADA [illegible]
[illegible]

August 18, 1983

U.S. Department of the Interior
Bureau of Land Management
Battle Mountain District Office
P. O. Box 194
Battle Mountain, NV 89820

Attention: Mr. R. James Fox, District Manager

RE: Comments on Draft Shoshone - Eureka RMP and EIS

Dear Mr. Fox:

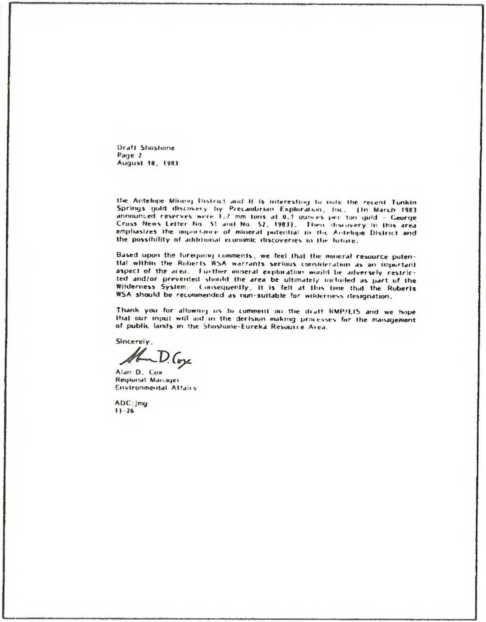
During the past few weeks several members of our Reno exploration staff have reviewed the Draft RMP/EIS referenced above. The Draft generally contains a good overview of alternatives developed for future management of BLM public domain lands in the Shoshone-Eureka Resource Area. We would, however, like to provide the following comments with particular emphasis on the wilderness suitability aspects and recommendations that will arise from the EIS development process.

The "Preferred Resource Management Plan" alternative appears to be an acceptable course of action in most respects with the exception of the recommendations for wilderness designation of the Roberts Wilderness Study Area (NV 060-541). As you are no doubt aware, the present boundary of the Roberts WSA includes a significant portion of the Antelope Mining District. This mining district was discovered during the early operations at Eureka and small productions of silver, lead and zinc have been reported (Nevada Bureau of Mines Bulletin 64; U.S. Bureau of Mines, Minerals Yearbook, 1950). Additionally, antimony and barite have been discovered in the area. Although historical production from the district has been quite small and not well documented, the general geology of the area indicates the potential for economic mineralization in several commodities.

Overall, the Roberts WSA lies over a window of "Lower Plate" limestones and other sedimentary rocks that are partially surrounded by "Upper Plate" cherts and argillites which have been thrust over the underlying limestones. This geologic setting is of particular importance as it is similar to the host rocks for many of the low grade, bulk tonnage gold mines found in the region (i.e. Cortez, Carlin, etc.). Active mineral exploration continues in

[illegible] GLENDALE AVENUE • SUITE [illegible] • SPARKS NEVADA [illegible]

Comment Letter 7



Draft Shoshone
Page 2
August 18, 1983

the Antelope Mining District and it is interesting to note the recent Tonkin Springs gold discovery by Precambrian Exploration, Inc. (In March 1983 announced reserves were 1.7 mm tons at 0.1 ounces per ton gold - George Cross News Letter No. 51 and No. 52, 1983). Then discovery in this area emphasizes the importance of mineral potential in the Antelope District and the possibility of additional economic discoveries in the future.

Based upon the foregoing comments, we feel that the mineral resource potential within the Roberts WSA warrants serious consideration as an important aspect of the area. Further mineral exploration would be adversely restricted and/or prevented should the area be ultimately included as part of the Wilderness System. Consequently, it is felt at this time that the Roberts WSA should be recommended as non-suitable for wilderness designation.

Thank you for allowing us to comment on the draft RMP/EIS and we hope that our input will aid in the decision making processes for the management of public lands in the Shoshone-Eureka Resource Area.

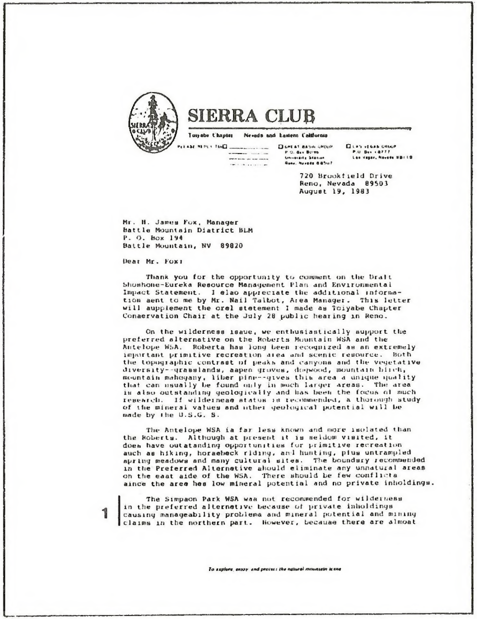
Sincerely,

Alan D. Cox

Alan D. Cox
Regional Manager
Environmental Affairs

ADC:jmg
11-26

Comment Letter 8



SIERRA CLUB
Toiyabe Chapter Nevada and Eastern California
PLEASE REPLY TO: ☐
☐ GREAT BASIN GROUP
P.O. Box 8096
University Station
Reno, Nevada 89507
☐ LAS VEGAS GROUP
P.O. Box 19777
Las Vegas, Nevada 89119

720 Brookfield Drive
Reno, Nevada 89503
August 19, 1983

Mr. H. James Fox, Manager
Battle Mountain District BLM
P. O. Box 194
Battle Mountain, NV 89820

Dear Mr. Fox:

Thank you for the opportunity to comment on the Draft Shoshone-Eureka Resource Management Plan and Environmental Impact Statement. I also appreciate the additional information sent to me by Mr. Neil Talbot, Area Manager. This letter will supplement the oral statement I made as Toiyabe Chapter Conservation Chair at the July 28 public hearing in Reno.

On the wilderness issue, we enthusiastically support the preferred alternative on the Roberts Mountain WSA and the Antelope WSA. Roberts has long been recognized as an extremely important primitive recreation area and scenic resource. Both the topographic contrast of peaks and canyons and the vegetative diversity--grasslands, aspen groves, dogwood, mountain birch, mountain mahogany, limber pine--gives this area a unique quality that can usually be found only in much larger areas. The area is also outstanding geologically and has been the focus of much research. If wilderness status is recommended, a thorough study of the mineral values and other geological potential will be made by the U.S.G. S.

The Antelope WSA is far less known and more isolated than the Roberts. Although at present it is seldom visited, it does have outstanding opportunities for primitive recreation such as hiking, horseback riding, and hunting, plus untrampled spring meadows and many cultural sites. The boundary recommended in the Preferred Alternative should eliminate any unnatural areas on the east side of the WSA. There should be few conflicts since the area has low mineral potential and no private inholdings.

1 The Simpson Park WSA was not recommended for wilderness in the preferred alternative because of private inholdings causing manageability problems and mineral potential and mining claims in the northern part. However, because there are almost

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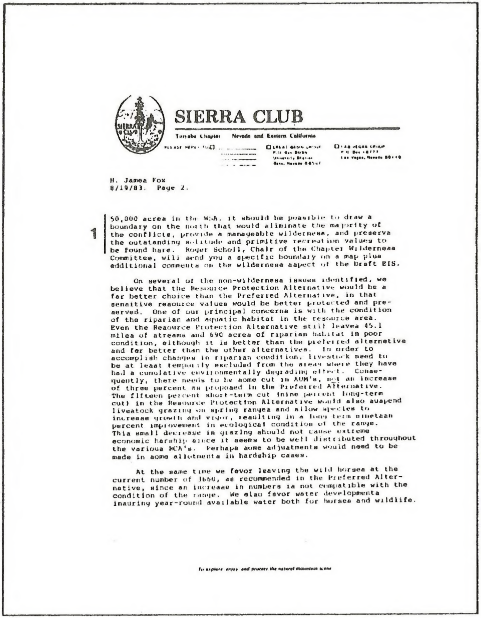
Comment Letter 8



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☐ LAS VEGAS GROUP
P.O. Box 19777
Las Vegas, Nevada 89119

H. James Fox
8/19/83. Page 2.

1 50,000 acres in the WSA, it should be possible to draw a boundary on the north that would eliminate the majority of the conflicts, provide a manageable wilderness, and preserve the outstanding solitude and primitive recreation values to be found here. Roger Scholl, Chair of the Chapter Wilderness Committee, will send you a specific boundary on a map plus additional comments on the wilderness aspect of the Draft EIS.

On several of the non-wilderness issues identified, we believe that the Resource Protection Alternative would be a far better choice than the Preferred Alternative, in that sensitive resource values would be better protected and preserved. One of our principal concerns is with the condition of the riparian and aquatic habitat in the resource area. Even the Resource Protection Alternative still leaves 45.1 miles of streams and 690 acres of riparian habitat in poor condition, although it is better than the preferred alternative and far better than the other alternatives. In order to accomplish changes in riparian condition, livestock need to be at least temporarily excluded from the areas where they have had a cumulative environmentally degrading effect. Consequently, there needs to be some cut in AUM's, not an increase of three percent as proposed in the Preferred Alternative. The fifteen percent short-term cut (nine percent long-term cut) in the Resource Protection Alternative would also suspend livestock grazing on spring ranges and allow species to increase growth and vigor, resulting in a long term nineteen percent improvement in ecological condition of the range. This small decrease in grazing should not cause extreme economic hardship since it seems to be well distributed throughout the various RCA's. Perhaps some adjustments would need to be made in some allotments in hardship cases.

At the same time we favor leaving the wild horses at the current number of 3660, as recommended in the Preferred Alternative, since an increase in numbers is not compatible with the condition of the range. We also favor water developments insuring year-round available water both for horses and wildlife.

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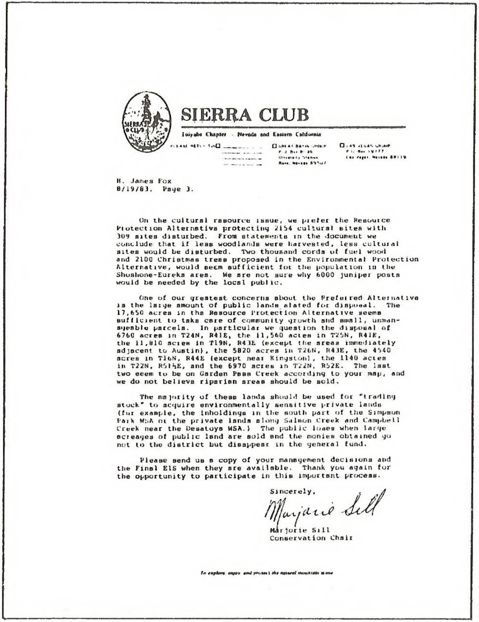
Comment Letter 8



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H. James Fox
8/19/83. Page 3.

On the cultural resource issue, we prefer the Resource Protection Alternative protecting 2154 cultural sites with 309 sites disturbed. From statements in the document we conclude that if less woodlands were harvested, less cultural sites would be disturbed. Two thousand cords of fuel wood and 2100 Christmas trees proposed in the Environmental Protection Alternative, would seem sufficient for the population in the Shoshone-Eureka area. We are not sure why 6000 juniper posts would be needed by the local public.

One of our greatest concerns about the Preferred Alternative is the large amount of public lands slated for disposal. The 17,650 acres in the Resource Protection Alternative seems sufficient to take care of community growth and small, unmanageable parcels. In particular we question the disposal of 6760 acres in T24N, R41E, the 11,560 acres in T25N, R41E, the 11,810 acres in T19N, R43E (except the areas immediately adjacent to Austin), the 5820 acres in T26N, R43E, the 4540 acres in T16N, R44E (except near Kingston), the 1140 acres in T22N, R51½E, and the 6970 acres in T22N, R52E. The last two seem to be on Garden Pass Creek according to your map, and we do not believe riparian areas should be sold.

The majority of these lands should be used for "trading stock" to acquire environmentally sensitive private lands (for example, the inholdings in the south part of the Simpson Park WSA or the private lands along Salmon Creek and Campbell Creek near the Desatoya WSA.) The public loses when large acreages of public land are sold and the monies obtained go not to the district but disappear in the general fund.

Please send us a copy of your management decisions and the Final EIS when they are available. Thank you again for the opportunity to participate in this important process.

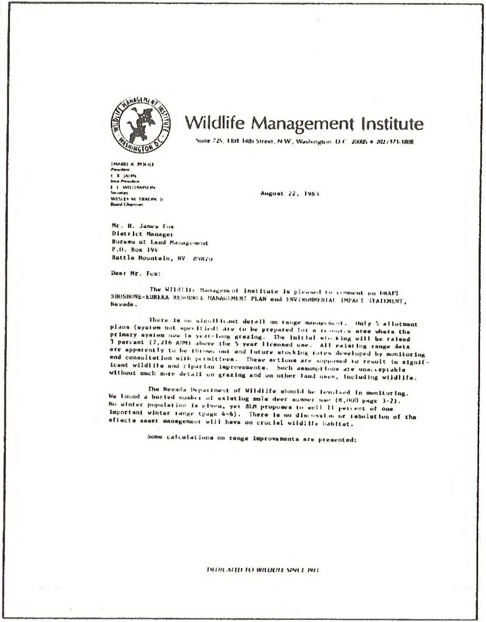
Sincerely,

Marjorie Sill

Marjorie Sill
Conservation Chair

To explore, enjoy and protect the natural mountain scene

Comment Letter 9



Wildlife Management Institute
Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 ● 202/371-1808

DANIEL A. POOLE
President
L. R. JAHN
Vice President
L. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

August 22, 1983

Mr. H. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, NV 89820

Dear Mr. Fox:

The Wildlife Management Institute is pleased to comment on DRAFT SHOSHONE-EUREKA RESOURCE MANAGEMENT PLAN and ENVIRONMENTAL IMPACT STATEMENT, Nevada.

There is no significant detail on range management. Only 5 allotment plans (system not specified) are to be prepared for a resource area where the primary system now is year-long grazing. The initial stocking will be raised 3 percent (7,216 AUM) above the 5 year licensed use. All existing range data are apparently to be thrown out and future stocking rates developed by monitoring and consultation with permittees. These actions are supposed to result in significant wildlife and riparian improvements. Such assumptions are unacceptable without much more detail on grazing and on other land uses, including wildlife.

The Nevada Department of Wildlife should be involved in monitoring. We found a buried number of existing mule deer summer use (8,000 page 3-2). No winter population is given, yet BLM proposes to sell 11 percent of one important winter range (page 4-6). There is no discussion or tabulation of the effects asset management will have on crucial wildlife habitat.

Some calculations on range improvements are presented:

DEDICATED TO WILDLIFE SINCE 1911

Comment Letter 9

Number of Operators	64
Improvement Cost	$1,295,000
Short term AUM created	7,216
Long term AUM created	26,527
Cost of a new long term AUM	$49.00
@ 8% interest per year	$ 3.92
U.S. income from grazing fee	$ 1.40
Annual Subsidy per new AUM	$ 2.52
Average subsidy per permittee from Range Developments	$20,234

In addition, an AUM is worth $50 on the value of the ranch (page 3-28). This is based on grazing preference. It is not proposed that this level be reached by this plan. However, the new long term AUM created will enable the permittees to avoid losing $1,326,350 of ranch value or another subsidy of $20,724 per permittee.

We believe Simpson Park should be classified as wilderness.

The first livestock-use objective (page 2-12) is "To initially manage livestock use at existing levels and determine if such use can be maintained." the plan does not follow this objective--there is an initial 12 percent increase.

Some specific comments follow:

Page 2-21, No. 15. "Wherever feasible". These imprecise words will preclude wildlife water in rested pastures.

Page 2-37, No. 22 to 25. No mention is made of wildlife stipulations in the harvest of woodland products.

Page 4-2, No. 6. If data are not adequate for making forage allocation decisions, how come they can be used to increase livestock use by 7,216 AUM? (page 4-8)

Page 4-18, 1st paragraph. Hunter days will increase 33 percent, but there is no detail of habitat improvements to justify this. On the other hand, grazing will increase 11 percent and a minimum of riparian areas will be fenced. Grazing systems are not described. We cannot accept this wildlife hunting projection.

Comment Letter 9

There has been no mention of livestock trespass, a common problem under year-long grazing.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:mgm

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Toiyabe Chapter – Nevada and Eastern California
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Las Vegas, Nevada [illegible]

September 18, 1983

H. James Fox, Manager
BLM/Battle Mountain District
PO Box 194
Battle Mountain, NV 89820

Dear Manager Fox,

I am commenting of the draft Shoshone-Eureka Resource Management Plan and Environmental Impact Statement for the Nevada Outdoor Recreation Association and the Public Lands Committee of the Toiyabe Chapter of the Sierra Club. NORA has been actively involved in public land management, especially protection of wilderness and other outstanding natural areas in Nevada and in the Battle Mountain District, for decades. The Toiyabe Chapter has nearly 2,000 members in Nevada and Eastern California who are vitally concerned with the management of the public lands in the Shoshone-Eureka RA.

I am extremely disappointed after reviewing the documents, as the draft DRMP fails as a planning guide and the DEIS is equally inadequate. I have reviewed all of BLM's land use plans in Nevada produced over the last few years, and the Shoshone-Eureka ranks as one of the worst.

My comments will not be comprehensive as there is very little to actually review. Basically, the alternatives proposed do not offer any meaningful short or long term solutions to the primary resource management problem in the Shoshone-Eureka area – overgrazing. Historic overgrazing has left the RA in over 70% less than good ecological condition (Table 3-3), although our members would consider this estimate an understatement of the problem. Yet the preferred alternative, if implemented, would only result in an estimated 9% improvement in range condition, leaving at least 61% in unsatisfactory condition. Current overgrazing would not be controlled for several years until monitoring provides "enough" data on which to base livestock reductions. Even the resource protection alternative would result in only an estimated 19% improvement, leaving over 50% of the 4,300,000 acres in less than good condition. Current grazing levels would not only continue, but be increased by 3% in the short term and 11% in the long term. Increases in livestock numbers do not seem to be an appropriate response to the serious problem of overgrazing and range deterioration.

The causes of the problems in the Shoshone-Eureka RA are evident in an examination of Table 2-1. 25 out of 46 allotments have year long grazing, while 9 others have early spring grazing before May 1st. It is usually recognized by range management professionals that uncontrolled and early grazing are the primary causes of deteriorated native rangelands. Only 7 allotments have Allotment Management Plans and 4 of these provide for year long grazing. How effective are these AMPs, especially since 4 of the 7 are in the I category? Only 5 new AMPs are proposed in the preferred and the resource protection alternatives. Has BLM abandoned AMPs as the main tool for improving range management, or has the Battle Mountain District abandoned the goal of improving range management?

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The "selective categorization" is a thoroughly undocumented and useless procedure. With 70% of the Shoshone-Eureka RA in less than good condition, BLM found only 10 (I) allotments it intends to improve, while 29 (C) are written off as un-improveable. This is an incredibly inadequate response to the massive resource management problems in the RA.

I have specific comments on several proposed management actions. Many actions proposed to benefit wildlife habitat are good, but without a comcomitant improvement in ecological range conditions will do little to significantly benefit wildlife in the short run or the long run. The protection of riparian areas is good, but not enough. The wilderness proposals in the resource protection alternative are good, but not enough. At a cost of $1,295,000 for a 3% increase in AUMs, range improvements proposed in the preferred alternative would take 127 years to be amortized at the current grazing fee. $179/AUM is too high a cost for "range improvements." No justification is given for the disposal of public lands. And recreation resources are very inadequately planned for.

No explanation is given for the omission of recommendations for ACECs. Both the Sierra Club and NORA find it extremely difficult to believe that in 4.3 million acres, there is not one area of critical environmental concern identified by the BLM. Charles Watson of NORA has been advising the Battle Mountain District for decades of areas of exceptional scenic, biological, paleontological, geological, and scientific value in the Shoshone RA. Such an omission reflects poorly on the knowledge of the outstanding resources of the Shoshone-Eureka RA by its managers.

While necessary grazing reductions are contingent on "monitoring" data, the RMP is very vague on the level and intensity of the monitoring program. If monitoring in 36 allotments (M&I) will be of "low intensity", how will BLM be able to determine if an allotment should be moved to a different category?

The DEIS is inadequate in its range of alternatives. A no grazing alternative was dismissed as impractical in Chapter 1, yet two more recent DEISs, the Egan and the Honey Lake-Beckwourth, both contain no grazing alternatives. How is the analysis of a no grazing alternative more impractical in the Shoshone-Eureka RA than in the Egan and the Honey Lake-

Backwourth RAs?

In summary, the DEIS/DRMP is inadequate in several areas:
1. Its proposals to solve serious resource management problems and guide public land management both in the short term and in the long term
2. Its environmental analysis of the proposed alternatives
3. Its range of alternatives

The document should be revised to present a full range of alternatives, including a no grazing alternatives. The alternatives should propose the following:
1. No disposal of the public lands, except on a case-by-case basis.
2. Tree cutting should be restricted to areas with little important wildlife or other resource values.
3. Riparian habitat improvement goals should be at least half of the total acres and aquatic habitat goals should be at least half of the total miles of streams. Wildlife habitat should be improved so that populations can reach reasonable numbers, at least in the long run.
4. Wild horse numbers should be reduced to the carrying capacity of the range, but at the same rate as livestock reductions in the same areas.
5. Livestock numbers or seasons-of-use should be reduced or changed or grazing systems implemented to adjust to the carrying capacity of the range in the short term as well as in the long term. AMPs should be developed or revised for every I category allotment. At least 70% of the allotments should be put in the I category and removed from the C category, especially those with high wildlife and other resource values.
6. Vegetation ecological condition goals should be increased to at least 50% in good condition in the RA. Trends should be improving or stable in all allotments. Any allotment with an overall decreasing trend should receive top priority for BLM funds and attention.
7. Cultural resource sites should receive protection with those most threatened receiving priority consideration.
8. All WSAs should be recommended as wilderness. In the case of the Simpson Park WSA, the boundaries should be adjusted to eliminate any demonstrably unmanageable areas.
9. We support the resource protection alternative in closing 49 ways. Recreation resources must receive more BLM attention. As the BLM recreation budget is currently limited, more use of volunteers should be incorporated in recreation plans.
10. Mineral exploration and development should be permitted so as not to negatively impact other resources.
11. Utility corridors should be limited to existing routes.

It was very discouraging for me to review this DEIS as it is clearly worse than the other recent Nevada EISs, repeating old problems and adding a few new ones. Its proposed management actions are even weaker and more inappropriate than those proposed in the other DEISs. I'm afraid the Shoshone-Eureka RMP reflects a weakening commitment by BLM to the improvement of

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the ecological condition of the public lands. I request that the DEIS be revised to include a no grazing alternative and that the selected alternative include as many as possible of the recommendations I have made above.

I trust that the explanation for the unsatisfactory document does not rest in the "input" received by the Battle Mountain District from a range consultant on resource problems and proposed actions (letter of 8/15/83).

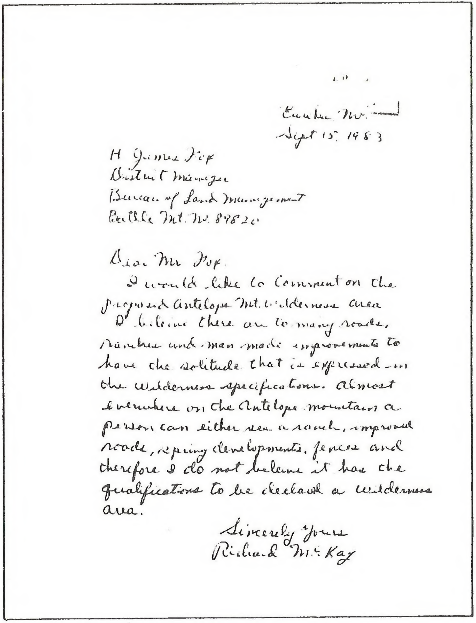
Thank you for considering our concerns.

Sincerely,

Rose Strickland

Rose Strickland, Chair
Public Lands Committee
(702) 747-4237

Comment Letter 11



Eureka Nv.
Sept 15, 1983

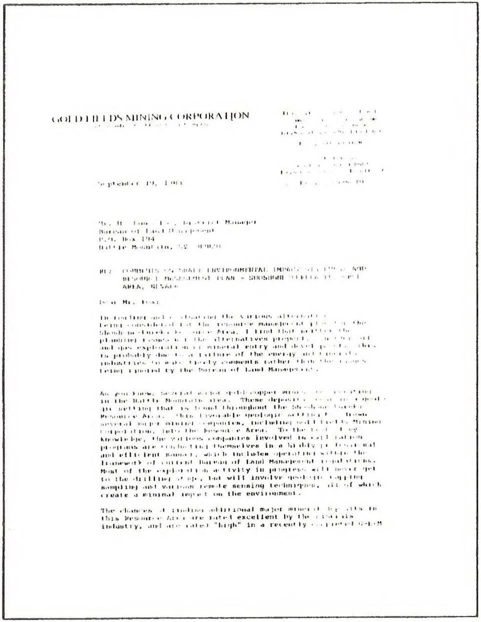
H James Fox
District Manager
Bureau of Land Management
Battle Mt. Nv. 89820

Dear Mr Fox.

I would like to Comment on the proposed Antelope Mt. Wilderness area. I believe there are to many roads, ranches and man made improvements to have the solitude that is expressed in the Wilderness specifications. Almost everywhere on the Antelope mountains a person can either see a ranch, improved roads, spring developments, fences and therefore I do not believe it has the qualifications to be declared a Wilderness area.

Sincerely Yours
Richard McKay

Comment Letter 12



GOLD FIELDS MINING CORPORATION

September 19, 1983

Mr. H. James Fox, District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, NV 89820

RE: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT AND RESOURCE MANAGEMENT PLAN - SHOSHONE-EUREKA RESOURCE AREA, NEVADA

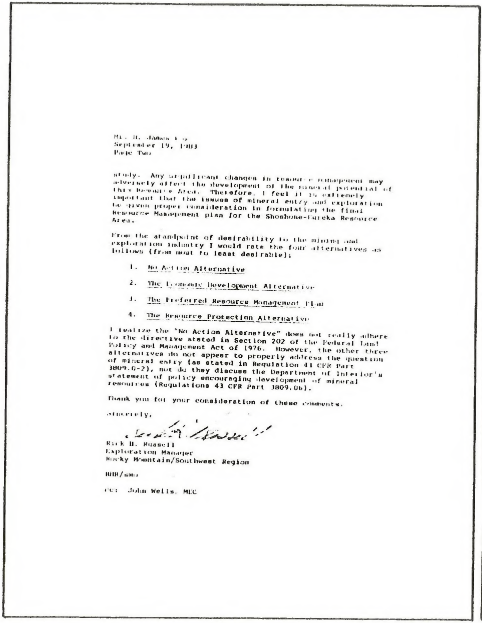
Dear Mr. Fox:

In reading and evaluating the various alternatives being considered for the resource management plan for the Shoshone-Eureka Resource Area, I find that neither the planning teams nor the alternatives properly [illegible] oil and gas exploration or mineral entry and development. This is probably due to a failure of the energy and minerals industries to make timely comments rather than the issues being ignored by the Bureau of Land Management.

As you know, several major gold-copper mines are located in the Battle Mountain area. These deposits occur in a geologic setting that is found throughout the Shoshone-Eureka Resource Area. This favorable geologic setting has drawn several major mining companies, including Gold Fields Mining Corporation, into the Resource Area. To the best of my knowledge, the various companies involved in exploration programs are conducting themselves in a highly professional and efficient manner, which includes operating within the framework of current Bureau of Land Management regulations. Most of the exploration activity in progress will never get to the drilling stage, but will involve geologic mapping, sampling and various remote sensing techniques, all of which create a minimal impact on the environment.

The chances of finding additional major mineral deposits in this Resource Area are rated excellent by the minerals industry, and are rated "high" in a recently completed G-E-M

Comment Letter 12



Mr. H. James Fox
September 19, 1983
Page Two

study. Any significant changes in resource management may adversely affect the development of the mineral potential of this Resource Area. Therefore, I feel it is extremely important that the issues of mineral entry and exploration be given proper consideration in formulating the final Resource Management plan for the Shoshone-Eureka Resource Area.

From the standpoint of desirability to the mining and exploration industry I would rate the four alternatives as follows (from most to least desirable):

1. No Action Alternative
2. The Economic Development Alternative
3. The Preferred Resource Management Plan
4. The Resource Protection Alternative

I realize the "No Action Alternative" does not really adhere to the directive stated in Section 202 of the Federal Land Policy and Management Act of 1976. However, the other three alternatives do not appear to properly address the question of mineral entry (as stated in Regulation 43 CFR Part 3809.0-2), nor do they discuss the Department of Interior's statement of policy encouraging development of mineral resources (Regulations 43 CFR Part 3809.06).

Thank you for your consideration of these comments.

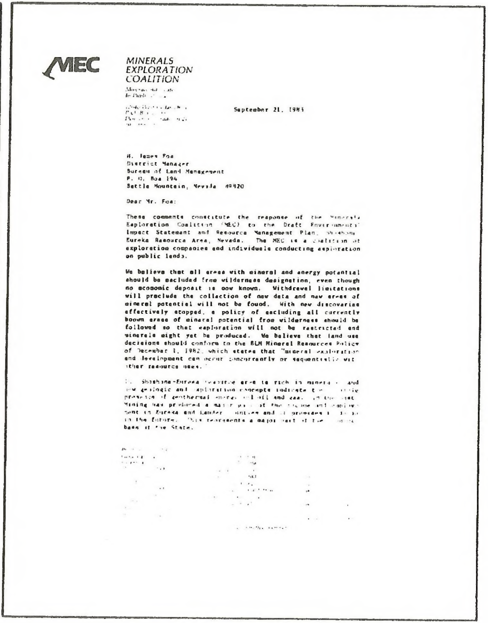
Sincerely,

Rick H. Russell
Exploration Manager
Rocky Mountain/Southwest Region

RHR/amo

cc: John Wells, MEC

Comment Letter 13



MEC
MINERALS
EXPLORATION
COALITION

September 21, 1983

H. James Fox
District Manager
Bureau of Land Management
P. O. Box 194
Battle Mountain, Nevada 89820

Dear Mr. Fox:

These comments constitute the response of the Minerals Exploration Coalition (MEC) to the Draft Environmental Impact Statement and Resource Management Plan, Shoshone-Eureka Resource Area, Nevada. The MEC is a coalition of exploration companies and individuals conducting exploration on public lands.

We believe that all areas with mineral and energy potential should be excluded from wilderness designation, even though no economic deposit is now known. Withdrawal limitations will preclude the collection of new data and new areas of mineral potential will not be found. With new discoveries effectively stopped, a policy of excluding all currently known areas of mineral potential from wilderness should be followed so that exploration will not be restricted and minerals might yet be produced. We believe that land use decisions should conform to the BLM Mineral Resources Policy of December 1, 1982, which states that "mineral exploration and development can occur concurrently or sequentially with other resource uses."

The Shoshone-Eureka resource area is rich in minerals and new geologic and exploration concepts indicate the [illegible] presence of geothermal energy and oil and gas. In the past Mining has produced a major part of the income and employment in Eureka and Lander counties and it promises to do so in the future. This represents a major part of the [illegible] base of the State.

Comment Letter 13

Shoshone/Eureka Resource Area
Page 2

Decisions resulting from the land use plans and the review of suitability of wilderness areas should assure the continued viability of this economic base. The areas of mineral and energy resource potential should remain open to exploration and development so that future economic resources can be found and extracted.

Any part of the land use plan or wilderness recommendation that withdraws mineral lands or restricts access, reduces the possibility of discovery of mineral or energy resources. Therefore, MEC opposes the Preferred Resource Plan because areas of significant mineral and energy resource potential in the Antelope and Roberts WSA's would be withdrawn from mineral development. Possibly some parts of these WSA's without mineral or energy resource potential could be recommended for wilderness.

Of the alternatives presented, MEC favors the No Action Alternative.

Thank you for the opportunity to comment on this Draft Environmental Impact Statement and Resource Management Plan for the Shoshone/Eureka Resource Area, Nevada.

Sincerely,

John D. Wells
President

Comment Letter 13

AtlanticRichfieldCompany
555 Seventeenth Street
Denver Colorado 80217
Telephone 303 575 7577

Mitchell
Public Lands Coordinator

September 20, 1983

Mr. H. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, NV 89820

Re: Draft Shoshone-Eureka Resource Management Plan

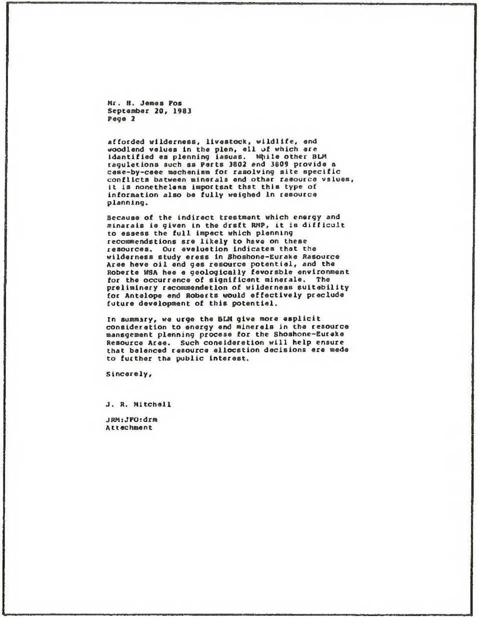
Dear Mr. Fox:

Atlantic Richfield Company appreciates having the opportunity to provide comments to the Bureau of Land Management (BLM) regarding the draft Shoshone-Eureka Resource Management Plan (RMP) and Wilderness EIS.

Atlantic Richfield earlier provided information to your office regarding our evaluation of the area's energy and mineral potential and our concern for its full consideration in the resource management planning process (see attachments). At this time, we would like to reinforce our position with specific comments on the draft RMP.

As earlier set forth, we are very concerned that energy and mineral resources be fully incorporated into the Bureau's land planning processes. We maintain that because the RMP will guide the long-term management of public lands in the Resource Area, it is imperative that energy and minerals be explicitly treated within the plan's framework to ensure that these resources receive equal consideration in resource allocation decisions. Activity plans that will be developed for wildlife habitat, wild horse herds, and woodland areas should fully integrate minerals data in their formulation; it is difficult to see how such integration can take place without explicit treatment of energy and minerals in the plan. For example, wildlife habitat stipulations or identification of critical habitat requirements can place seasonal or permanent restrictions on mineral development. The RMP states that the Preferred Alternative will only recommend areas for wilderness where the wilderness values and related benefits offset the other uses foregone because of such designation. Energy and minerals, one of these other uses, should be given the status

Comment Letter 14



Mr. H. James Fox
September 20, 1983
Page 2

afforded wilderness, livestock, wildlife, and woodland values in the plan, all of which are identified as planning issues. While other BLM regulations such as Parts 3802 and 3809 provide a case-by-case mechanism for resolving site specific conflicts between minerals and other resource values, it is nonetheless important that this type of information also be fully weighed in resource planning.

Because of the indirect treatment which energy and minerals is given in the draft RMP, it is difficult to assess the full impact which planning recommendations are likely to have on these resources. Our evaluation indicates that the wilderness study areas in Shoshone-Eureka Resource Area have oil and gas resource potential, and the Roberts WSA has a geologically favorable environment for the occurrence of significant minerals. The preliminary recommendation of wilderness suitability for Antelope and Roberts would effectively preclude future development of this potential.

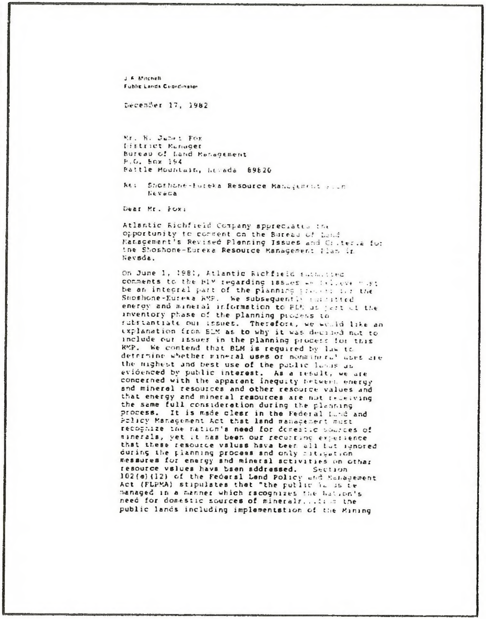
In summary, we urge the BLM give more explicit consideration to energy and minerals in the resource management planning process for the Shoshone-Eureka Resource Area. Such consideration will help ensure that balanced resource allocation decisions are made to further the public interest.

Sincerely,

J. R. Mitchell

JRM:JFO:drm
Attachment

Comment Letter 14



J. R. Mitchell
Public Lands Coordinator

December 17, 1982

Mr. H. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, Nevada 89820

Re: Shoshone-Eureka Resource Management Plan
Nevada

Dear Mr. Fox:

Atlantic Richfield Company appreciates the opportunity to comment on the Bureau of Land Management's Revised Planning Issues and Criteria for the Shoshone-Eureka Resource Management Plan in Nevada.

On June 1, 1981, Atlantic Richfield submitted comments to the BLM regarding issues we believe must be an integral part of the planning process for the Shoshone-Eureka RMP. We subsequently submitted energy and mineral information to BLM as part of the inventory phase of the planning process to substantiate our issues. Therefore, we would like an explanation from BLM as to why it was decided not to include our issues in the planning process for this RMP. We contend that BLM is required by law to determine whether mineral uses or nonmineral uses are the highest and best use of the public lands as evidenced by public interest. As a result, we are concerned with the apparent inequity between energy and mineral resources and other resource values and that energy and mineral resources are not receiving the same full consideration during the planning process. It is made clear in the Federal Land and Policy Management Act that land management must recognize the nation's need for domestic sources of minerals, yet it has been our recurring experience that these resource values have been all but ignored during the planning process and only mitigation measures for energy and mineral activities on other resource values have been addressed. Section 102(a)(12) of the Federal Land Policy and Management Act (FLPMA) stipulates that "the public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals...from the public lands including implementation of the Mining

Mr. H. James Fox
December 17, 1982
Page 2

and Minerals Policy Act of 1970, as it pertains to public lands." The Public Lands and Resources; Planning, Programming, and Budgeting (43 CFR Part 1600) regulations require the following measures for planning:

- o Present and potential uses of public lands shall be considered
- o Resource demand forecasts and analyses relevant to the Resource Area
- o Opportunities to meet goals and objectives defined in National and State Director guidance
- o The District Manager or Resource Area Manager shall arrange for resource...data and information to be collected.
- o Several complete, reasonable resource management alternatives shall be prepared for the Resource Area.

It must be noted that the term "resource" applies not only to renewable resources, but also to nonrenewable resources. Therefore, the above requirements must be applied to energy and mineral resources as required by law. While certain, reasonable mitigation measures may be necessary, a complete evaluation of energy and mineral resource potential must be made in order to provide the same opportunities for energy and mineral resource development that are afforded other resources.

We realize that it is difficult for a complete evaluation of energy and mineral resources to be made during this process, due to the nature of the resources themselves. Nevertheless, a concerted effort must be made by the BLM to gather as much information as possible in order to determine what resource values actually exist in a particular planning area so that appropriate planning decisions may be made.

Attached is a copy of an energy and mineral rating system as outlined in the December 10th Federal Register. We believe the BLM should use such a

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Mr. H. James Fox
December 17, 1982
Page 3

rating system to gather energy and mineral potential data from industry and other government agencies for utilization during the planning process and for wilderness study. We would like to point out, however, that these ratings would reflect current knowledge and technology and must be subject to modification should new information become available. This is especially true due to the nature of exploration activities and the possibilities that new information or technology could shed new light on the areas' potential.

Atlantic Richfield believes that energy and minerals must play a major role in land management decisions. The exploration for and development of these resources should be provided for in this plan by opening or maintaining access to areas which may contain these resources. Areas identified as having energy and mineral potential should influence other resource decisions. Access to these areas should be restricted only by the minimum legal standards established for environmental protection. In areas where conflicting resource values may outweigh mineral values, the BLM should identify what minimum environmental protection is necessary to meet the plan objective for these resources.

It is important for the BLM to recognize how energy and mineral resource values should influence the land management decisions and the role of minerals in the formulation of management prescriptions. In order to comply with the FLPMA requirements and to achieve the goals and objectives of multiple use management, the BLM needs to:

1. To provide for mineral resource and development on BLM lands.
2. Identify lands having energy and mineral potential and take action to open or maintain access to those resources, while meeting minimum legal standards for environmental protection.
3. Identify where conflicting resource values outweigh mineral resource values and what

minimum standards for protection must be met to meet the plan objectives.

The BLM is required to show the effects of alternatives on all resource values, including energy and mineral resources. Each of the management alternatives selected must identify the tradeoffs that would occur as a result of the possible implementation of that alternative as it relates to energy and mineral values. The tradeoffs should include: opportunities and restrictions for access to minerals, minimum protection stipulations required under each alternative, and analysis of relative value placed on each conflicting resource.

The District Manager is required to develop a preferred alternative which will be meet national and State Director guidance. When the preferred plan alternative is ultimately selected and published, each prescription for management should describe the specific impact on energy and mineral resources. This should include: the minimum standard requirements for surface protection upon issuance of leases, permits and plans of operation; and what additional requirements if any, are to be placed on these activities in order to meet the objective of the prescription. Also, the prescription should give rationale as to why normal standards are not sufficient to protect the land use objective

With regard to the wilderness studies, the BLM's Wilderness Study Policy dated February 3, 1982, Criterion No. 2; Standard No. 1 Energy and Mineral Resource Values, states, "Recommendations as to an area's suitability or nonsuitability for wilderness designation will reflect a thorough consideration of any identified or potential energy and mineral resource values." In other words the planning process requires full consideration of these resources and an assessment of impacts to their use and management. We believe that it is the responsibility of BLM to develop an energy and mineral alternative in order to comply with the Wilderness Study Policy directive.

The energy and mineral alternative would place emphasis on resource development by providing

opportunities for commodity production in areas having significant possibilities for resource development. This would mean that areas with good or high mineral potential would be recommended for a nonwilderness designation. The remaining areas which are void of other conflicts and which still possess wilderness values and are capable of being managed as wilderness could be recommended as suitable for wilderness.

In order to prepare an energy and mineral alternative, BLM would utilize the energy and mineral inventory data which has been gathered during the study process. This information would provide the basis for boundary adjustments on areas where such an approach is feasible or would provide the basis for a nonwilderness recommendation.

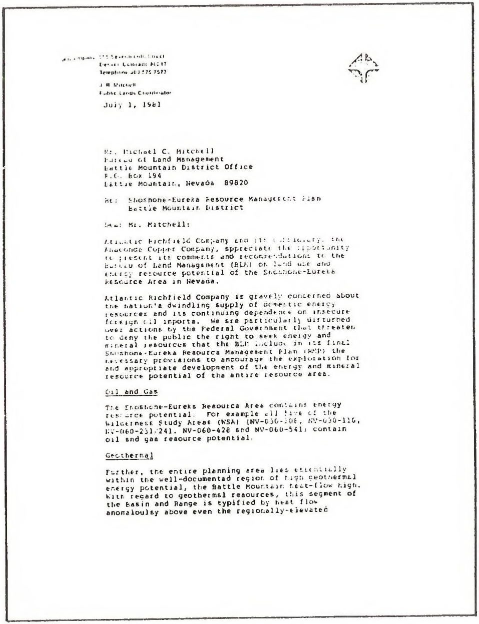
Atlantic Richfield supports effective land and resource management plans and actions that provide for reasonable protection of the environment, while at the same time, providing for the exploration and development of natural resources. The development of uniform, workable, and effective management standards for natural resources under the jurisdiction of the BLM is of utmost importance. Inflexible environmental laws and regulations have often characterized the manner in which the government has constrained the search for and development of additional energy and mineral supplies. Such constraints have severely limited the accessibility and utilization of energy and mineral resources needed to add stability to the Nation's economy and to reduce its dependence on insecure foreign imports. However, the BLM is not required to continue in this mode of management. It has an opportunity to develop land management standards and guidelines along the multiple-use concept that will help remedy the situation.

In conclusion, we urge that the BLM carefully consider our comments in order that the Congressional mandates of FLPMA and the Mining and Minerals Policy Act are fully implemented and to insure that energy and mineral resources are afforded full consideration in the land management planning of the public lands.

Sincerely,

J. R. Mitchell
CMM:drm

Comment Letter 14



AtlanticRichfieldCompany 555 Seventeenth Street
Denver Colorado 80217
Telephone 303 575 7577

J. R. Mitchell
Public Lands Coordinator

July 1, 1981

Mr. Michael C. Mitchell
Bureau of Land Management
Battle Mountain District Office
P.O. Box 194
Battle Mountain, Nevada 89820

Re: Shoshone-Eureka Resource Management Plan
Battle Mountain District

Dear Mr. Mitchell:

Atlantic Richfield Company and its subsidiary, the Anaconda Copper Company, appreciate the opportunity to present its comments and recommendations to the Bureau of Land Management (BLM) on land use and energy resource potential of the Shoshone-Eureka Resource Area in Nevada.

Atlantic Richfield Company is gravely concerned about the nation's dwindling supply of domestic energy resources and its continuing dependence on insecure foreign oil imports. We are particularly disturbed over actions by the Federal Government that threaten to deny the public the right to seek energy and mineral resources that the BLM include in its final Shoshone-Eureka Resource Management Plan (RMP) the necessary provisions to encourage the exploration for and appropriate development of the energy and mineral resource potential of the entire resource area.

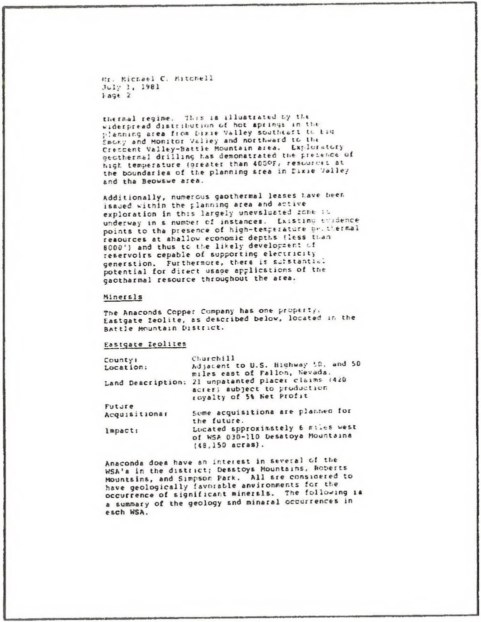
Oil and Gas

The Shoshone-Eureka Resource Area contains energy resource potential. For example all five of the Wilderness Study Areas (WSA) (NV-030-108, NV-030-110, NV-060-231/241, NV-060-428 and NV-060-541) contain oil and gas resource potential.

Geothermal

Further, the entire planning area lies essentially within the well-documented region of high geothermal energy potential, the Battle Mountain heat-flow high. With regard to geothermal resources, this segment of the Basin and Range is typified by heat flow anomaloulsy above even the regionally-elevated

Comment Letter 14



Mr. Michael C. Mitchell
July 1, 1981
Page 2

thermal regime. This is illustrated by the widerpread distribution of hot springs in the planning area from Dixie Valley southeast to Big Smoky and Monitor Valley and northward to the Crescent Valley-Battle Mountain area. Exploratory geothermal drilling has demonstrated the presence of high temperature (greater than 400°F) resources at the boundaries of the planning area in Dixie Valley and the Beowawe area.

Additionally, numerous geothermal leases have been issued within the planning area and active exploration in this largely unevaluated zone is underway in a number of instances. Existing evidence points to the presence of high-temperature geothermal resources at shallow economic depths (less than 8000') and thus to the likely development of reservoirs capable of supporting electricity generation. Furthermore, there is substantial potential for direct usage applications of the geothermal resource throughout the area.

Minerals

The Anaconda Copper Company has one property, Eastgate Zeolite, as described below, located in the Battle Mountain District.

Eastgate Zeolites

County:	Churchill
Location:	Adjacent to U.S. Highway 50, and 50 miles east of Fallon, Nevada.
Land Description:	21 unpatented placer claims (420 acres) subject to production royalty of 5% Net Profit
Future Acquisitions:	Some acquisitions are planned for the future.
Impact:	Located approximately 6 miles west of WSA 030-110 Desatoya Mountains (48,150 acres).

Anaconda does have an interest in several of the WSA's in the district; Desatoya Mountains, Roberts Mountains, and Simpson Park. All are considered to have geologically favorable environments for the occurrence of significant minerals. The following is a summary of the geology and mineral occurrences in each WSA.

Mr. Michael C. Mitchell
July 1, 1981
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Augusta Mtns.

Chiefly sedimentary rocks of Triassic-age which are comprised of sandstone, shale, conglomerate in the lower part of Augusta Sequence and limestone, shale and sandstone of the upper part of the Augusta Sequence. Volcanic rocks are mostly Tertiary ash-flow tuffs.

Mercury was produced from the Wild Horse Mining district located in the Southern part of the mountains.

Desatoya Mtns.

Consists almost entirely of volcanic rocks of Tertiary age, gently east dipping ash flow tuffs and tuffaceous sedimentary rocks. Locally, the volcanics are intruded by dikes of felsic and mafic intrusive rocks.

The Gold Basin Mining district, located in the Southern part of the Mountains produced 150 tons of ore in a 1912 operation. Occurrences of mercury and uranium are south of this district.

Antelope

The Antelope Range is underlain by carbonate rocks. Along the county line, the rocks are overlain by volcanics consisting largely of andesitic flows and pyroclastics.

No known mineralization occurs in the WSA.

Simpson Park

Largely made up of chert, shale, quartzites of Ordovician and Silurian age. Volcanic and pyroclastic rocks underlie much of the north and south parts of the range.

The Roberts Mining district is located on the west side of the Simpson Mtns. Keystone Mine is the only producing property in this district. Copper, silver, lead, and zinc were mined.

Mr. Michael C. Mitchell
July 1, 1981
Page 4

Roberts Mtns.

Essentially an eastward tilted block composed of complexly deformed chert, shale and sandstone, the area is overlapped on the east by volcanic rocks.

No known mineralization occurs in the WSA.

References

1. Mineral and Water Resources of Nevada, Bulletin 65, MacKay School of Mines.
2. Geology and Mineral Resources of Eureka Co., Nevada 1967.
3. Radioactive Mineral Occurrences in Nevada, Larry J. Garside, Bull. 81, 1973.
4. Geology and Mineral deposits of Lander County, Nevada, 1977.

Atlantic Richfield Company supports the multiple-use management concept for the nation's public lands and believes that the best interest of the nation will be served if they are managed in this manner. Also, we believe that the public has the right to know what resource potential exists on public lands prior to the imposition of far-reaching land withdrawal decisions. Accordingly, we recommend that the final RMP for the Shoshone-Eureka Resource Area include provisions and compatible land use allocations that encourage exploration and appropriate development of the energy and mineral resource potential of the entire area, including the five WSA's that are being considered for wilderness designation.

Again, we appreciate the opportunity to comment to the BLM on this important issue.

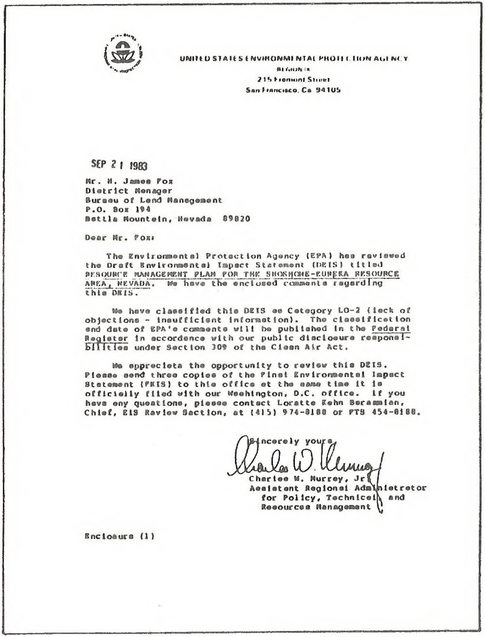
Sincerely,

J. R. Mitchell

J. R. Mitchell

JRM/CMM/drm
Attachment

Comment Letter 15



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca 94105

SEP 21 1983

Mr. H. James Fox
District Manager
Bureau of Land Management
P.O. Box 194
Battle Mountain, Nevada 89820

Dear Mr. Fox:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled RESOURCE MANAGEMENT PLAN FOR THE SHOSHONE-EUREKA RESOURCE AREA, NEVADA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category LO-2 (lack of objections - insufficient information). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

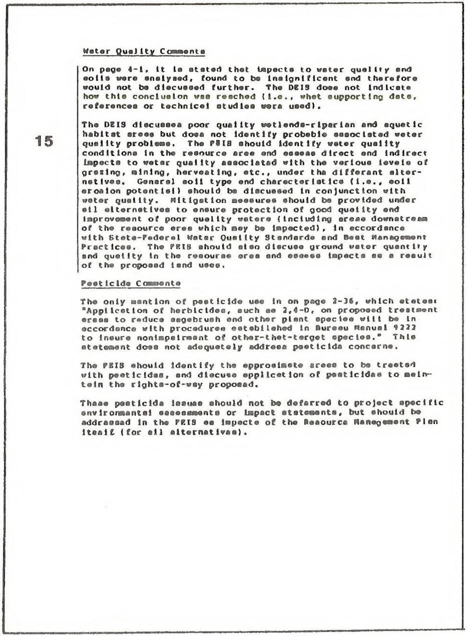
We appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy, Technical, and
Resources Management

Enclosure (1)

Comment Letter 15



Water Quality Comments

On page 4-1, it is stated that impacts to water quality and soils were analysed, found to be insignificant and therefore would not be discussed further. The DEIS does not indicate how this conclusion was reached (i.e., what supporting data, references or technical studies were used).

15 The DEIS discusses poor quality wetlands-riparian and aquatic habitat areas but does not identify probable associated water quality problems. The FEIS should identify water quality conditions in the resource area and assess direct and indirect impacts to water quality associated with the various levels of grazing, mining, harvesting, etc., under the different alternatives. General soil type and characteristics (i.e., soil erosion potential) should be discussed in conjunction with water quality. Mitigation measures should be provided under all alternatives to ensure protection of good quality and improvement of poor quality waters (including areas downstream of the resource area which may be impacted), in accordance with State-Federal Water Quality Standards and Best Management Practices. The FEIS should also discuss ground water quantity and quality in the resource area and assess impacts as a result of the proposed land uses.

Pesticide Comments

The only mention of pesticide use in on page 2-36, which states: "Application of herbicides, such as 2,4-D, on proposed treatment areas to reduce sagebrush and other plant species will be in accordance with procedures established in Bureau Manual 9222 to insure nonimpairment of other-that-target species." This statement does not adequately address pesticide concerns.

The FEIS should identify the approximate areas to be treated with pesticides, and discuss application of pesticides to maintain the rights-of-way proposed.

These pesticide issues should not be deferred to project specific environmental assessments or impact statements, but should be addressed in the FEIS as impacts of the Resource Management Plan itself (for all alternatives).

EUREKA, NEVADA PUBLIC HEARING TESTIMONY

Bill Card, Rancher, Eureka, Nevada

6 The first question I have is on the Antelope Wilderness Area. You´ve got an estimated 1,200 visitor hours, in addition to whatever the visitor hours are supposed to be out there now. My first question is, what provisions do you have for taking care of these people that will be out there using this wilderness area?

7 Along the same lines, wilderness area, I wondered what provisions are there to keep the road open out there? It will take a snow plow to get past my place four to six months out the year.....If it becomes a wilderness area, this has to be taken care of; because snow or no snow, no matter how much, people are going to try to go through anyway. They do it. They go up there and get stuck, and it´s up to me to take care of them again.

The same thing happens in the summertime...I don´t want the responsibility of having to take care of these people.

8 There´s something about not driving vehicles onto the wilderness area. Most of this wilderness area, the Antelope, is on my permit, my ranch. I don´t know what percentage, but just about all of it. I need to be able to get on there with my pickup to be able to handle it.

RENO, NEVADA PUBLIC HEARING TESTIMONY

Bob Warren, Executive Secretary, Nevada Mining Association

9 On Page S-2, the summary of planning issues, I noticed that the -- And this has become a trend now with all of the environmental impact statements. BLM is not stating one of the Basic Criteria for qualification of the wilderness area. BLM is leaving out the reference that an area must be roadless. That is the number one criteria; therefore, you can´t plan, and have resource management issues, without recognizing the most important issue: whether or not an area has wilderness suitability, because it aqualifies as a roadless area.

10 On Page 1-4, again, it states that special attention will be given to social economic impacts upon local communities. Then, in the very last section on 4-19, you point out that there is no significant -- These wilderness designations will have no significant impact upon the economy of the area. It´s obvious that if the areas that are dependent upon mining, as properly indicated, are not permitted to enjoy the fruits of future mining in theses areas, there will be a major economic impact.

12 The Nevada Mining Association has contracted with three professors at the University of Nevada in the Department of Economics who have done a study of the economic impact of the mining industry in Nevada. They have updated, and given you much more useable data. Yours is largely limited to 1980, in many respects. Some of this is as recent as 1982. It shows the impacts.

11 Another general statement — On Page 315, and several pages following there. I used to complain about the fact that there were a lot of roads in these areas. I noticed this EIS is calling most of them "ways" now, only indicating that there are a few roads where it's so obvious that is the only way to avoid that..... And, also, a way maintained solely by the passage of vehicles, the BLM states that this is not a road. But the Interior Board of Land Appeals has ruled that this is a road; and very clearly, that this is a road, and there is no reason to go out and maintain a road by any other means if driving over it does it.

Barbara Kelly

1 I don't support the preferred resource plan as it's formulated right now. I'd like to see a couple of changes in it. One of them would be to include part of the Simpson Park Range, the south end especially, which still has really good wilderness values.

Dave Hornbeck

1 I generally support the designation of the two areas that you have indicated that would be included; that is, the Antelope and the Roberts Mountains. I, too, think though that you should include Simpson Park. I have not been in that area on foot, but I have viewed it from the air; and it appears to me to be a magnificent area, especially with some of the forest that exists on it. And I was looking through the technicial report, trying to determine exactly what basis you used for eliminating it.

13 One thing I think that is a mistake in the approach the BLM uses to analyzing these wilderness study area, in terms of whether or not there's a conflict with mineral potential, is that ..... Through the inventory process and everything else, you've winnowed these down to a few areas that meet the wilderness criteria, and are in fact wilderness areas. You call them "wilderness study areas." Then you compare the conflicts with mining and mining potential solely within the wilderness potential boundary..... I think what you should be doing is taking the gem studies, and so forth, for the whole state. Take the percentage that the wilderness study areas would represent out of the entire area that is available for mining in this state, and I'm sure that you would find that that is an extremely small percentage of all of the area that is available for mining in this state....

If it has a very minor impact on all of the mining area, its values should therefore be preserved in relationship to the very small amount of impact it has on the mining area. Therefore, I do find fault with the fact that you have chosen to eliminate the Simpson Park area, because from the opportunities I´ve had to see that area, I think that it does represent an outstanding area of wilderness. I would encourage you to reconsider that decision, with an eye toward including at least the major central areas of that area in a wilderness recommendation. 13

Amy Mazza

1;14 I support the BLM´s analysis, with the addition of roughly the southern half of the Simpson Park WSA ... It is in a natural state, roughly six times the requisite size, and has dissected terrain and pinyon juniper forests offering the opportunity for solitude. It is no narrower than the narrow portions of the Roberts WSA, which are entirely adequate.

Roger Scholl, Wilderness Committee Chairman,
Toiyabe Chapter of the Sierra Club

1 Lastly, we urge that the BLM reconsider the southern portion of the Simpson Park WSA. I, and other club members, have flown this area and driven some of the boundary. We find it quite rugged and scenic. The BLM´s analysis shows that most of the conflicts with mining activity are in the north end of the unit. These conflicts could be largely eliminated by drawing a wilderness boundary from, for example, Underwood Canyon into Shagnasty Basin, while not totally eliminating the wilderness resource in the WSA. We believe the southern two-thirds of the area is sufficiently large, rugged, and heavily wooded, especially in the southwest, to be manageable as wilderness.

Appendix A

ENERGY AND MINERAL POTENTIAL RATING SYSTEM

The following classification system was used to evaluate the mineral resource potential of the wilderness study areas in the Shoshone-Eureka Resource Area.

Classification Scheme

Rating	Description
1.	The geologic environment and the inferred geologic processes do not indicate favorability for accumulation of mineral resources.
2.	The geologic environment and the inferred geologic processes indicate low favorability for accumulation of mineral resources.
3.	The geologic environment, the inferred geologic processes, and the reported mineral occurrences indicate moderate favorability for accumulation of mineral resources.
4.	The geologic environment, the inferred geologic processes, the reported mineral occurrences, and the known mines or deposits indicate high favorability for accumulation of mineral resources.

Level of Confidence Scheme

Rating	Description
A.	The available data are either insufficient and/or cannot be considered as direct evidence to support or refute the possible existence of mineral resources within the respective area.
B.	The available data provide indirect evidence to support or refute the possible existence of mineral resources.
C.	The available data provide indirect evidence but are quantitively minimal to support or refute the possible existence of mineral resources.
D.	The available data provide abundant direct and indirect evidence to support or refute the possible existence of mineral resources.

GLOSSARY

ACRONYMS

BLM - Bureau of Land Management

RARE 11 - The second U.S. Forest Service Roadless Area Review and Evaluation.

WSA - Wilderness Study Area

TERMS

ALLOTMENT - An area designated for the use of a prescribed number and class of livestock under one plan of management.

ALLOTMENT MANAGEMENT PLAN (AMP) - A documented program which applies to livestock operations on the public lands, which is prepared in consultation with the permittee(s) or lessee(s) involved, and which: (1) prescribes the manner in and extent to which livestock operations will be conducted in order to meet the multiple use, sustained yield, economic, and other needs and objectives as determined for the public land through land use planning; (2) describes the type, location, ownership, and general specifications for the range improvements to be installed and maintained on the public lands to meet the livestock grazing and other objectives of land management; and (3) contains such other provisions relating to livestock grazing and other objectives as may be prescribed by the authorized officer consistent with applicable law.

ANIMAL UNIT MONTH (AUM) - The amount of feed or forage required to sustain a mature cow or the equivalent for one month.

ASH FLOW - A highly heated moisture of volcanic gases and ash, traveling down the flanks of a volcano or along the surface of the ground and produced by the explosive disintegration of viscous lava in a volcanic crater or by the explosive emission of gas-charged ash from a fissure or group of fissures.

BAJADA - A series of confluent alluvial fans along the base of a mountain range.

BASE, FERROUS AND PRECIOUS METALS - Those groups of metals which include copper, lead, zinc, tungsten, molybdenum, beryllium, manganese, antimony, arsenic, bismuth, tin, iron, nickel, lithium, thorium, uranium, vanadium, gold, silver, mercury, and the platinum group.

BASIN AND RANGE - A geomorphic province characterized by fault-block mountains and intervening basins.

BENCH - An accepted local usage for bajada.

BITTERBRUSH ZONE - The area where bitterbrush (Purshia Tridentata or P. glandulosa) occurs. This is usually on benches and in canyon bottoms.

BROWSE - That part of the current leaf and twig growth of shrubs, woody vines and trees available for animal consumption.

CHAINING - The process of knocking over, for the purpose of extirpating, pinyon and juniper trees by means of dragging an anchor chain between two large caterpillar tractors.

CHERRYSTEM ROADS - Dead end roads into a WSA which form part of the boundaries of that WSA.

CLOSED DESIGNATION - Areas and trails where the use of motor vehicles is permanently or temporarily prohibited.

CRESTED WHEATGRASS SEEDIGNS - Areas where the natural vegetation is removed or modified by chaining or plowing and then seeded with crested wheatgrass. This increases the productivity of the area to provide forage for livestock, wild horses and big game animals.

CULTURAL RESOURCE CATEGORIES:

Open Aboriginal Site (Pre-Historic) - Any unobstructed physical location, i.e., not caves or rock shelter, of Native American activities, either specific or general, relevant to that period of time prior to written history The activity may range from specific, e.g., a quarry, to general, e.g., a permanent village. In general, Nevada written history is post A.D. 1850, but may be as early as the 1820's or as late as the 1870's.

Historic Sites - Any specific location which has physical evidence of human activities within the period of recorded history and which can be related to non-aboriginal peoples, i.e., Euro-Americans, Asians, Afro-Americans or any other post A.D. 1800 immigrant group. The evidence may range from a single item, such as a bottle, to mining related structures and features, roads, ranches, towns, etc.

Historic Aboriginal - Any specific location which either through intrinsic evidence or archival documentation or tradition can be identified with Native Americans, such as Shoshone or Paiutes, in the period of written history.

EXTRUSIVE ROCKS - Igneous rocks derived from magmas or magmatic materials poured out or ejected at the earth's surface.

FAULT BLOCK - A mass bounded on at least two opposite sides by faults.

FORAGE - All browse and herbaceous foods that are available to grazing animals. It may be grazed or harvested for feeding.

GRANDFATHERED USE - An authorized use taking place on the public lands as of the date of the enactment of the Federal Land Policy and Management Act (October 21, 1976).

GRAZING PREFERENCE - A basis upon which permits and licenses are issued for grazing use. It is the total number of animal unit months of livestock grazing apportioned and attached to base property or water owned or controlled by a permittee or lessee.

HABITAT MANAGEMENT PLAN - A written and officially approved plan for a specific geographic area which identifies wildlife habitat and related objective, establishes the sequence of actions for achieving objectives, and outlines procedures for evaluating accomplishments.

HERD MANAGEMENT AREA PLAN - A written program of action designed to protect, manage and control wild and free roaming horses and burros to maintain a natural ecological balance on the public lands.

HIGH ANGLE FAULT - A fault with a dip greater than 45°.

HIGH EROSION POTENTIAL WATERSHED - Watershed areas that are presently in a stable condition but which are subject to high rates of erosion if the native vegetation or topsoil is altered in any way. Deliniation is based on soil type, vegetative cover, root depth, slope, and climate.

INTRUSIVE ROCKS - A rock which consolidated from magma beneath the surface of the earth.

KIDDING GROUNDS - Areas used by female antelope to bear their young.

LICENSED USE - The portion of a permittees grazing preference that is used in a grazing season within an allotment and which is authorized on a grazing license.

MAAR VOLCANO - A crater formed by violent explosion and not accompanied by igneous extrusion.

MAGMATIC GASES - Gases associated with molten rock or magma.

MANAGEMENT FRAMEWORK PLAN - A land use plan for the public lands which provides a set of goals, objectives, and constraints for a specific planning area to guide the development of detailed plans for the management of each resource.

MINERAL POTENTIALS:

High Potential - High potential is assigned to areas that contain or are extensions of active or inactive properties which show evidence of ore, mineralization, and favorable geologic characteristics. All producing properties fall within this category.

Good Potential - Good potential is assigned to areas with several geologic characteristics indicative of mineralization, relatively lower economic value of past production, and similar environments but at greater distances from known ore and mineral occurrences. This category may include areas adjacent to known districts or in mineral belts.

Speculative Potential - Speculative potential is assigned to areas having some favorable geologic parameters and inferences based on geologic models and analogies to known favorable environments. Increasing depth of alluvial cover over areas of potential deposits is also a consideration in this category, except in the case of oil and gas potential.

Low Potential - Low potential is assigned to areas that are outside any construed favorable geologic and mineral trend projections or are buried by over 1,500 meters of alluvium (except oil and gas).

MINING DISTRICT - A section of country usually designated by name and described or understood as being confined within certain natural boundaries, in which gold or silver or other minerals may be found in paying quantities.

MOUNTAIN BRUSH COMMUNITY - Describes a high elevation area, in mountainous terrain that is comprised of primarily brush species including service berry, mountain mahogany, wildrose, chokecherry and snowberry.

MOUNTAIN GRASSLAND - Describes a high elevation area, in mountainous terrain that is comprised primarily of grass species such as bluegrasses, needlegrasses, fescues, and others.

MOUNTAIN MEADOW - Describes a high elevation area, in mountainous terrain that is comprised primarily of wet meadow sedges and grass species.

MULTIPLE USE - "...the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural, scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output", (Section 103, Federal Land Policy and Management Act of 1976).

NATIONAL NATURAL LANDMARK - A specific area designated by the Secretary of the Interior which contains a representative example(s) of the nation's natural history, including terrestrial communities, aquatic communities, landforms, geological features or habitats of native plant and animal species, possessing national significance in illustrating or interpreting the nation's natural heritage.

NATIONAL REGISTER OF HISTORIC PLACES - The official list, established by the Historic Preservation Act of 1966, of the nation's cultural resources worthy of preservation.

NONMETALLIC AND INDUSTRIAL MINERALS - Includes carbon, diamond, coal, bitumen, asphalt, boron, sulfur, rock salt, etc; lack the properties of the metallic minerals, such as bright luster, hardness, density and good conductors of heat and electricity. Rocks and minerals not produced as sources of metals but used rather for their own physical properties.

NORTHERN DESERT SHRUB COMMUNITY - A general term applied to the broad vegetative types inhabiting much of the intermountain cold desert shrub region. Typical plants include sagebrush, winterfat, budsage and rabbitbrush. Several types of grasses are also present, including wheatgrasses, bottlebrush squirreltail, Indian ricegrass, galleta grass, needle-and-thread grass and Great Basin wildrye.

OPEN DESIGNATION - Areas on public lands where motor vehicles may be operated, subject only to standard operating regulations.

PATENTED MINING CLAIM - A mining claim where the claimant has received title to the minerals and usually the surface by fulfilling the requirements of the applicable mining laws.

PERMITTEE - One who holds a permit to graze livestock on state, federal, or certain privately owned lands.

PINYON AND JUNIPER ENCROACHMENT - The invasion of pinyon pine and juniper trees into a dominant brushland area where pinyon pine and juniper have not previously occurred or in an area where the dominant brushland is essential to the sustenance of wildlife species.

PUBLIC LAND - Vacant, unappropriated, and unreserved lands which have never left Federal ownership; also lands in Federal ownership which were obtained by the Government in exchange for public lands or for timber on public lands. Land administered by the Bureau of Land Management.

RANGELAND MONITORING PROGRAM - A program designed to measure changes in plant composition, ground cover, animal populations, and climatic conditions on the public rangeland. Vegetation studies will be used to monitor changes in rangeland condition and determine the reason for any changes that are occurring. The vegetation studies consist of actual use, utilization, trend, and climatic conditions.

RESURGED CALDRON - A caldera into which new molten material was emplaced following its initial formation.

RIPARIAN COMMUNITIES - Vegetative communities found in association with either open water or water close to the surface; includes meadows, aspen, another trees and shrubs in association with streams and other water sources.

ROAD - Vehicle routes which have been improved and maintained by mechanical means to ensure relatively regular and continuous use.

SAGEBRUSH ZONE - An area where at least one species of sagebrush occurs and is the predominant species (includes Artemesia tridentata, A. nova, A. arbuscula, A. frigida, A. cana and others).

SCOPING PROCESS - An early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.

SEASONAL DEPENDENCE - The dependence of a particular wildlife species on a particular piece of habitat for specific life requirements during a specific season of the year. For example, desert bighorn sheep may have a seasonal dependance on specific spring sources or water holes during the driest season of the year.

SHEAR ZONE - A zone in which shearing has occurred on a large scale so that the rock is crushed and becciated.

SPECIES, ENDANGERED - An animal or plant whose prospects of survival and reproduction are in immediate jeopardy, and as is further defined by The Endangered Species Act of 1973.

SPECIES, THREATENED - Any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range, and as is further defined by the Endangered Species Act of 1973.

SPRING CONCENTRATION AREA - Areas within a particular species habitat that provide essential needs to that species during the spring. These areas are usually smaller in proportion to the overall habitat and result in a higher concentration of species during the spring.

STATE SELECTION LANDS - Federal lands chosen by and granted to the State under the provisions of its Statehood Act.

SUSTAINED YIELD - "...the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use", (Section 103, Federal Land Policy and Management Act of 1976).

THRUST FAULT - A fault that is characterized by a low angle of inclination with reference to a horizontal plane.

TONOPAH INDIVIDUAL EXPERIMENTAL STEWARDSHIP PROGRAM - An experimental program to be implemented on the public rangelands in the Tonopah Resource Area. The program would provide incentives to or rewards for the holders of grazing permits and leases whose effective management results in an improvement of range conditions on lands under permit or lease. The program shall explore innovative grazing management systems and concepts.

UTILITY CORRIDOR - A corridor through an area in which all utility transmission facilities, both existing and proposed, are located resulting in less area disturbed and a minimum of environmental damage.

VEGETATIVE MANIPULATION PROJECTS - Actions taken which alter the existing natural plant communities to achieve the goals of management in a particular area. There are several ways in which vegetation can be altered: (1) With fires; (2) mechanically, which includes chaining, plowing or crushing; (3) chemically; and (4) biologically.

WATER BASE LIVESTOCK OPERATION - A livestock operation that uses livestock waters which it controls to qualify for a grazing preference on public rangeland.

WAYS - A vehicle route established and maintained solely by the passage of motor vehicles.

WILDERNESS CHARACTERISTICS - Identified by Congress in the 1964 Wilderness Act: Namely, size, naturalness, outstanding opportunities for solitude or a primitive and unconfined type of recreation, and supplemental values such as geological, archaeological, historical, ecological, scenic, or other features. It is required that the area possess at least 5,000 acres or more of contiguous public land or be of a size to make practical its preservation and use in an unimpaired condition; be substantially natural or generally appear to have been affected primarily by the forces of nature with the imprint of man being substantially unnoticeable; and have either outstanding opportunities for solitude or a primitive and unconfined type of recreation. Congress said a wilderness area may have supplemental values, which include ecological, geological, or other features of scientific, educational, scenic, or historical value. However, the presence of absence of supplemental values could not make or eliminate an area for wilderness designation.

WILDERNESS MANAGEMENT POLICY - This policy document prescribed the general objectives, policies, and specific activity guidance applicable to all designated BLM wilderness areas. Specific management objectives, requirements, and decisions implementing administrative practices and visitor activities in individual wilderness areas are developed and described in the wilderness management plan for each unit.

WILDERNESS STUDY AREA (WSA) - A roadless area which has been found to have wilderness characteristics.

WILDERNESS VALUES - Includes the wilderness characteristics and multiple resource benefits of an area.

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